



# 9-1-1 REQUIREMENTS FOR MULTI-LINE TELEPHONE SYSTEMS (MLTS)

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## Abstract

This document has been prepared by representatives of the MESB region as a contribution to the Minnesota SECB NG9-1-1 Committee for potential use as a resource to educate and guide Minnesota PSAP personnel and MLTS owners/operators in MLTS 9-1-1 requirements. Increased compliance with these requirements supports timely and effective emergency response by providing accurate call routing, callback number, and dispatchable location whenever a MLTS user dials 9-1-1. The document summarizes the issue, reasons for compliance, federal and state requirements, and common problems encountered by public safety. It provides guidance for PSAPs on handling and reporting the issues they experience with MLTS 9-1-1 calls, as well as implementation and testing guidance for MLTS owners/operators. Resources are also listed.

# 9-1-1 Requirements for Multi-Line Telephone Systems (MLTS)

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## The Issue

Many multi-line telephone systems (MLTS) serving large campuses and corporate environments are not identifying a caller's specific location and, as a result, are limiting the ability of public safety telecommunicators to identify the precise location of the emergency. This introduces critical delays in response and wastes valuable public safety resources. MLTS owners and operators are often unaware of and/or do not comply with the 9-1-1 requirements in federal and state statutes.

## Reasons for Compliance

It is in the best interest of everyone involved for MLTS owners and operators to comply with federal and state 9-1-1 requirements for MLTS. Listed below are some of the key reasons to comply. Non-compliance:

- Violates laws and creates potential liability.
- Can result in 9-1-1 calls being routed to the incorrect emergency communications center.
- Introduces delays in emergency response resulting in possible loss of life or property.
- Makes it difficult for responders to find 9-1-1 callers who are unable to communicate or articulate their location.
- Hinders the responsibility of enterprises to protect the health and safety of their employees and visitors.
- Wastes valuable public safety resources.

## Key Definitions

### Multi-Line Telephone Systems (MLTS)

MLTS cover the full range of on-premises and networked communications systems that service enterprises, including IP-based and cloud-based systems. They can be residential or business systems. MLTS are phone systems where the owner/operator is responsible for configuring the system to provide a precise dispatchable location and callback phone number when 9-1-1 is dialed.

Locations commonly using MLTS enterprise solutions:

- Assisted living centers and retirement communities
- Academic or business campuses with multiple buildings
- Corporate enterprise phone systems serving multiple site locations in various cities or states
- Multi-tenant buildings where one phone system serves several tenants
- High-rise office or apartment buildings
- Government facilities
- Healthcare facilities
- At-home business phone systems with two or more lines
- Phone systems that allow mobility
- Manufacturing facilities with multiple entrances

### Dispatchable Location

The official street address of the 9-1-1 calling party, plus additional information such as suite, apartment, room number, or similar information necessary to identify the caller's precise location. In certain instances, dispatchable location may be coordinate-based if it is sufficient to identify the caller's civic address and

approximate in-building location. Dispatchable locations are not necessarily postal addresses nor are they vanity addresses.

The definition of dispatchable location varies depending on the environment from which a 9-1-1 call originates, and the amount of information needed by first responders to adequately identify the caller's location. Dispatchable location information needs to be automatically conveyed without further intervention by the user at the time the 9-1-1 call is placed.

### Public Safety Answering Point (PSAP)/Emergency Communications Center (ECC)

The terms PSAP and ECC are often used interchangeably and refer to the entity where 9-1-1 calls are delivered by the 9-1-1 Service Provider. A PSAP/ECC would typically receive and process requests for emergency assistance (e.g. 9-1-1 calls), determine the appropriate response based on available resources, and coordinate the emergency response. The individuals answering 9-1-1 calls at a PSAP/ECC are known as public safety telecommunicators. In this document the term PSAP will be used.

## 9-1-1 Requirements for MLTS

### Requirements under Federal Statutes

#### Kari's Law

##### *What are the requirements of Kari's Law?*

- ✓ **Direct 9-1-1 Dialing.** Any MLTS must allow callers to dial 9-1-1 directly without needing to dial a prefix like "9" to get an outside line.
- ✓ **Central Notification.** When a 9-1-1 call is made, to facilitate building entry by first responders, the MLTS must also send a notification to a central location, like a front desk or security kiosk, and include a callback number and information about the caller's location.

##### *Who must comply with Kari's Law?*

- ✓ **Entities or individuals who make, import, sell, lease, install, manage or own/operate an MLTS**

##### *When is Kari's Law compliance a requirement?*

- ✓ **MLTS manufactured, sold, or installed after February 17, 2020**

#### Ray Baum's Act

##### *What are the requirements of Section 506 of Ray Baum's Act?*

- ✓ **Dispatchable Location.** A dispatchable location is required to be passed along with every 9-1-1 call to a PSAP, regardless of the technology platform, including 9-1-1 calls from a MLTS.
- ✓ **Dependencies.** The specific dispatchable location requirements for MLTS depend on whether the MLTS device is **on-premises or off-premises** and whether it is **fixed or non-fixed**.
  - **On-premises/off-premises.** An on-premises MLTS device is one that is within the fixed property (e.g., building(s), facilities, or campus) and under the operational control of a single administrative authority. An off-premises MLTS device is one that is not located within the fixed property that is under operational control of a single authority.
  - **Fixed/non-fixed.** A fixed MLTS device is one that connects to a single end point (e.g., a desk or office phone) and is not capable of being moved to another endpoint by the end user, although it may be capable of being moved to a different endpoint by a professional installer or network manager. A non-fixed MLTS device is one that the end user can move from one endpoint to another without assistance.
- ✓ **Location Information Requirements by MLTS Device Type.**

- **For on-premises, fixed devices.** An on-premises, fixed device associated with an MLTS shall provide **automated dispatchable location** with 9-1-1 calls. (47 CFR § 9.16(b)(3)(i))
- **For on-premises, non-fixed devices.** An on-premises, non-fixed device associated with an MLTS shall provide to the appropriate PSAP **automated dispatchable location**, when technically feasible; otherwise, it shall provide **dispatchable location based on end user manual update**, or **alternative location information**. (47 CFR § 9.16(b)(3)(ii))
- **For off-premises devices.** An off-premises device associated with an MLTS shall provide to the appropriate PSAP **automated dispatchable location**, if technically feasible; otherwise, it shall provide **dispatchable location based on end user manual update**, or **enhanced location information**. (47 CFR § 9.16(b)(3)(iii))

#### **Who must comply with Section 506 of Ray Baum's Act?**

- ✓ **Entities or individuals who manufacture, import, sell, lease, install, manage or own/operate an MLTS**

#### **When is Ray Baum's Act compliance a requirement?**

- ✓ **MLTS manufactured, sold, or installed after February 17, 2020**

## **Requirements under Minnesota Statutes 403.15**

**Note:** For MLTS manufactured, sold, or installed after February 17, 2020, federal statutes provide additional 9-1-1 requirements beyond those defined in Minnesota statutes.

#### **What are the requirements of MN Statutes 403.15?**

- ✓ **Callback Number and Emergency Response Location.** Every owner and operator of a new multi-station or private branch exchange (PBX) MLTS purchased after December 31, 2004, shall design and maintain the system to provide a callback number and emergency response location that is specific enough for an emergency response team to locate the caller.
- ✓ **User Dialing Instructions.** Each MLTS owner/operator must demonstrate or otherwise inform each new telephone system user how to call for emergency assistance from that particular MLTS.
- ✓ **Automatic Number and Location Identification Requirements for shared residential, hotel/motel, business, and school multiline phone systems, including exemptions.** See MN Statutes 403.15 for details.

#### **Who must comply with MN Statutes 403.15?**

- ✓ **Entities or individuals who own or operate an MLTS**

#### **When is MN Statutes 403.15 compliance a requirement?**

- ✓ **Requirements for user dialing instructions and shared residential MLTS apply regardless of when the system was installed.**
- ✓ **Requirements for hotel/motel, business, and school MLTS apply to new multiline telephone systems purchased after December 31, 2004.**

## **MLTS Owner/Operator Guidance on MLTS 9-1-1 Compliance**

- ✓ **Know 9-1-1 requirements for MLTS.** MLTS owners/operators have a responsibility to be familiar with their 9-1-1 responsibilities and comply with federal and state government 9-1-1 requirements. Information about the appropriate integration of a MLTS with 9-1-1 can be found through various government resources and industry sources. The Minnesota State Emergency Communications Board (SECB) also has resource materials available, including those contained in this document and related resource links. At a high-level, the 9-1-1 compliance checklist for MLTS includes:
  - **Direct Dialing of 9-1-1**

- **Central Notification**
- **Accurate Callback Number**
- **Dispatchable Location**
- **End User Training**
- ✓ ***Include 9-1-1 requirements in telecom/IT procurement and planning.*** Plan for 9-1-1 compliance as part of the functional capabilities when procuring a new or upgrading an existing telecommunications platform solution. When evaluating solutions, consider the unique environment of the organizations it will serve, as well as the various methods users could access 9-1-1 through the provided solution.
- ✓ ***Manage multiple vendors.*** Be clear on 9-1-1 compliance responsibilities with all telecommunications platform solution vendors. When there are different vendors involved in a solution, be clear how each is contributing (or not) to the MLTS owner/operator being capable of meeting federal and state requirements. For example, some traditional telecom service providers may provide the network connections but leave it up to the MLTS owner/operator and/or the system/platform provider to configure and implement any 9-1-1 compliance aspects of the solution.
- ✓ ***Audit compliance to identify areas and levels of risk.*** The goal of any 9-1-1 compliance plan is the safety and security of employees and visitors, as well as limiting any potential liability. Beyond the technical details of MLTS compliance, review overall security policies and procedures and consider compliance audits. Documented guidelines are helpful for maintaining 9-1-1 compliance when adding, moving, or changing out network switches, routers, endpoints, and user devices. Also, notification systems need to be clearly visible to immediately notify support staff of a 9-1-1 call and its location. Consider policies on monitoring these notifications and meeting public safety personnel responding to the emergency call. Even considerations such as building signage can aid emergency response personnel.
- ✓ ***Manage the operational responsibilities of providing accurate location data.*** In most cases, the MLTS owner/operator will need to prepare and maintain location data associated with MLTS endpoints, such as fixed devices, switch/gateway locations, IP addresses and network access points, Wi-Fi access points, etc. Different systems may have different tools for managing these locations. Be clear on the initial and ongoing responsibilities for MLTS data maintenance and accuracy.
- ✓ ***Validate the addresses used.*** For call locations to validate and be mapped correctly for 9-1-1 dispatch and response, street addresses and city names should be consistent with those assigned by official addressing authorities. When provisioning these address locations, consult with the local PSAP on any questions about the authoritative addressing to use for 9-1-1.
- ✓ ***Notify and Train Users.*** Under Minnesota statutes, the MLTS owner/operator is to provide employees training on how to reach emergency services. They should also be informed of any MLTS limitations in accurately and automatically transmitting location, as well as any actions users need to take to provide or confirm location especially for non-fixed devices. This is especially important for remote teleworkers. User training should be included in the onboarding process for all new employees.
- ✓ ***Consider 9-1-1 solution providers.*** Many 9-1-1 solution providers have extensive informational material on MLTS and 9-1-1 available on their websites. MLTS owners/operators seeking technical guidance on how to properly integrate their MLTS with 9-1-1 may benefit from discussions with 9-1-1 solution providers.
- ✓ ***Conduct Proactive testing.*** MLTS Owners/Operators are strongly encouraged to conduct proactive 9-1-1 testing of their phone system to ensure compliance to 9-1-1 requirements. To avoid any interference of the 9-1-1 tests with normal emergency operations, owners/operators should gain prior authorization.

## MLTS Owner/Operator Guidance on 9-1-1 Testing

### Testing Coordination

Minnesota PSAPs strongly encourage 9-1-1 testing of MLTS. Generally, a small number of 9-1-1 test calls (10 or less a day) can be accommodated during normal operations of a PSAP without disrupting the PSAP's ability to meet the needs of all 9-1-1 callers. Large numbers of test calls, tests of complex issues, or situations in which the MLTS owner/operator would like the engagement of a supervisor, however, require prior notice and PSAP coordination.

### Typical 9-1-1 Testing (10 or less MLTS test calls)

- ✓ **Optimal testing time.** Generally, the best time to perform 9-1-1 testing is during the work week (Monday-Friday) and daytime hours (preferably midday, e.g., 10am-2pm).
- ✓ **Diversity of tests.** Prepare a test plan including an appropriate sampling of call locations and types. The "MLTS 9-1-1 Testing Criteria" section of this document lists key items to check with each test call. Conduct at minimum of one test call from every site located at a unique street address/city. Depending on the telecom system configuration, conduct at least one test call from every call origination type (fixed, portable, etc.) If some call locations are automatically generated rather than pre-provisioned, test those options as well. Also include a sampling of in-building dispatchable addresses.
- ✓ **Announcing test calls.** On the day of testing, please make sure to announce any 9-1-1 call as a test call right away. The telecommunicator who answers the call will be able to assist at that time by confirming key 9-1-1 information with the person initiating the test call. ***Please note, should there be a very high volume of emergencies at the time, the public safety telecommunicator may put the call on hold or ask that the tests be deferred until later.***

### Complex/Extensive 9-1-1 Testing

- ✓ **Identify PSAP contact(s) for testing.** There are multiple PSAPs operating in the State of Minnesota. To identify the PSAP(s) covering the MLTS sites, visit the [Answering Centers/PSAPs Directory page](#) of State of Minnesota 9-1-1 Program website. Search by the county in which a site is located and contact the "9-1-1 Answering Center" listed (not the State Patrol District). When contacting the PSAP, ask to speak to a supervisor to coordinate 9-1-1 call testing. *Note: Hennepin County has some city operated PSAPs in addition to the PSAP operated by the Hennepin Sheriff.*
- ✓ **Prior Notice.** Please reach out to the PSAP supervisor at least 2 to 3 days in advance of the desired test date.
- ✓ **Optimal testing time.** Generally, the best time to perform 9-1-1 testing is during the work week (Monday-Friday) and daytime hours (preferably midday, e.g., 10am-2pm). Since there may be variations to this optimal test time when extensive testing is conducted, please make sure to confirm this with the PSAP supervisor.
- ✓ **Diversity of tests.** Prepare a test plan in advance and include a script and/or checklist, especially if multiple testers will be involved from the MLTS organization. A cross section of all call locations and types is important. At a minimum, tests plans would conduct a minimum of one test call from every site located at a unique street address/city. Depending on the telecom system configuration, at least one test call would also be made from every call origination type (fixed, portable, etc.) If some call locations are automatically generated rather than pre-provisioned, those options would be tested. A sampling of in-building dispatchable addresses would also be included. The "MLTS 9-1-1 Testing Criteria" section of this document lists key items to check with each test call.
- ✓ **Share test plan with PSAP.** Make sure to discuss the test plan with the affected PSAP supervisor(s).

- ✓ **Announcing test calls.** On the day of testing, please make sure to announce any 9-1-1 call as a test call right away. The telecommunicator who answers the call will be able to assist at that time by confirming key 9-1-1 information with the person initiating the test call. ***Please note, should there be a very high volume of emergencies at the time, the public safety telecommunicator may put the call on hold or ask that the tests be deferred until later.***

## MLTS 9-1-1 Testing Criteria

The key items to confirm during testing are those related to federal 9-1-1 requirements of Kari's Law and Section 506 of Ray Baum's Act:

- **Direct Dialing of 9-1-1.** Confirm 9-1-1 can be dialed directly by the caller, without needing to dial a prefix like "9" to get an outside line.
- **Central Notification.** Confirm that when a 9-1-1 call is made, the phone system sends a notification to a central location for the site where a 9-1-1 call has been made, including a callback number and information about the caller's location (e.g., main office, internal safety team, main entrance attendant, etc.)
- **Correct PSAP Routing.** Confirm the call reached the correct PSAP for the caller's location.
- **Correct Callback Number.** Confirm that a valid, dialable phone number is displayed to the telecommunicator and that number will reach the individual who made the 9-1-1 call or someone who can identify the caller. A callback number that goes directly to a recording or phone tree is not acceptable. It is also recommended that on a few of the 9-1-1 test calls, the telecommunicator attempts a callback to the phone number.
- **Correct Business Name.** Confirm that the specific business or site name is displayed to the telecommunicator. For example, Burnsville High School rather than ISD #191 is more helpful to the telecommunicator. *Typically, 28 characters will display at the PSAP for the name field.*
- **Correct Street Address and City.** Confirm the caller's actual street address and city coincides with what is displayed to the telecommunicator. The telecommunicator will also be able to validate that the address plots accurately on their mapping applications.
- **Correct Dispatchable Location.** Confirm the caller's accurate dispatchable location is displayed to the telecommunicator. This is additional in-building information, beyond the validated street address, that is needed by first responders to adequately identify the caller's location at the site (e.g., room number or similar details). Note that when assigning in-building information, place the most important/descriptive information at the beginning of the data field. *Typically, only the first 20 characters will display at the PSAP.*
- **Portable Devices.** For phone systems where 9-1-1 calls may originate from non-fixed devices, it is recommended to test and confirm accurate functioning of 9-1-1 calls from both known on-premises locations, as well as locations off-premises.
- **Shared Phone Numbers among Multiple Locations.** For phone numbers that can originate from multiple sites, the caller's accurate location must automatically display when dialing 9-1-1 from each distinctive site.

## Additional 9-1-1 Testing Considerations

- **Issues encountered during testing.**
  - Many issues are tied to an improper telephone number and/or improper location information being sent with the 9-1-1 call. Should there be issues encountered during testing, it is recommended that MLTS owners/operators review internal phone system setup, IP configuration, and endpoint mapping, as well as any arrangements with the MLTS telecom service provider or 9-1-1 solution provider.



- Sending 9-1-1 calls to a third-party national call center for handling, rather than configuring the MLTS to operate correctly with 9-1-1, introduces delays. PSAPs highly recommend these national centers only be used in a fallback scenario. Third-party national call centers must probe the caller to determine location, determine the appropriate local PSAP for that location, and then transfer the call to the PSAP's 24/7 administrative phone number. This creates confusion and greatly extends the time to start local emergency response.
- **Incorporate 9-1-1 testing into system change management.** It is important to include 9-1-1 testing as part of any major system upgrade or after system reboots to ensure configuration settings do not change and/or inadvertently have a negative effect on 9-1-1 compliance.
- **Re-testing.** Each telecom system has its own unique complexities. While PSAPs cannot troubleshoot or resolve phone system 9-1-1 integration issues, they are happy to retest with MLTS owners/operators, as needed, until successful test results have been achieved.

## Common MLTS 9-1-1 Problems Encountered by PSAPs

Many multi-line telephone systems (MLTS) that do not comply with 9-1-1 requirements can introduce confusion at the time of an emergency, cause critical delays in emergency response, and waste valuable public safety resources. Problems typically seen at PSAPs related to MLTS include:

- **Incorrect PSAP Routing.** 9-1-1 calls are misrouted and sent to the incorrect PSAP for the caller's location.
- **Incorrect Callback Number.** Calling back the telephone number provided with the call does not reach the caller or someone at the location where the emergency originated who can assist with clarifying the caller's location and/or situation. For example, rather than reaching the caller, the callback number is the organization's main (pilot) telephone number answered at another site, at an unstaffed location, or by someone unaware that 9-1-1 has been called by someone in their business/organization.
- **Incorrect Caller Location.** The street address and city of the caller provided with the call is inaccurate and limits the ability of public safety telecommunicators to identify the precise location of the caller and the emergency. For example, with a multi-site business or school district, it may be the street address of the main, rather than satellite, location.
- **Insufficient or Incorrect Dispatchable Location Information.** The location provided with the call includes only a street address when a more specific, often in-building, location is necessary for responders to be able to locate the caller (e.g., apartment number, room name, etc.), OR the additional dispatchable location information is provided but it is inaccurate.
- **No Record Found.** No location is provided with the call. A "No Record Found" condition often results in a misrouted call as well.

## PSAP Guidance on Handling MLTS 9-1-1 Issues

### Gather Information about the Issue

Regardless of reporting method, prior to conveying a 9-1-1 issue to the MLTS owner/operator and/or the telecom service provider:

- ✓ **Be familiar with federal and state requirements for MLTS and 9-1-1.** At a high-level, the 9-1-1 compliance checklist for MLTS includes:
  - **Direct Dialing of 9-1-1**
  - **Central Notification**
  - **Accurate Callback Number**

- **Dispatchable Location**
- **End User Training**

These requirements are further detailed in this document and its related resource links.

- ✓ **Be clear on the type of problem.** Since the issues may be inter-related, it is important to identify and convey all routing, callback, and location issues. See the preceding problem list for common problems that may be encountered.
- ✓ **Record call date(s)/time(s) and pertinent call information.** Useful details include information seen at the PSAP, such as telephone number and location display (ANI/ALI), as well as information received from the caller. This may include screenshots and/or CDRs from call handling equipment or Computer Aided Dispatch (CAD) information about the incident.

## Report the Issue

Please note that while reporting MLTS 9-1-1 problems through traditional channels may help in some instances, often efforts to resolve the error are most successful and expeditious when PSAPs contact the business or institution directly to engage with the MLTS owner/operator.

### Traditional Methods

- ✓ **Submit an ALI Discrepancy Report on the 9-1-1 ALI service provider's online tool** (e.g., Lumen/Intrado 9-1-1NET or similar system used by IES). Provide details about the business name, caller's location, and telephone number used to make the 9-1-1 call. Monitor the service provider's investigation comments on the online tool. Take additional action if it appears the resolution is stalled.
- ✓ **Contact the service provider directly.** Unless the call was an NRF, search for the NENA Company Identifier (4- or 5-character code) from the call's ALI display on NENA's website: <https://cid.nena.org/>. The website will provide a 24/7/365 emergency contact to report the problem to the service provider. Typically, a trouble ticket will be opened for the issue. Record the ticket number. Follow up to monitor progress. Take additional action if it appears the resolution is stalled.

### Direct Engagement

- ✓ **Determine an appropriate contact for outreach.** Often the most difficult aspect of resolving an MLTS issue is finding the right person in the organization operating the MLTS who has the understanding, means, and priority to resolve the issue. Who and how to make contact will vary.
  - For **small commercial MLTS operators**, like a business with a few geo-diverse locations, often the best place to start is with a receptionist, explaining the issue that 9-1-1 is not working properly and asking who handles their phone system. The receptionist may escalate the issue to a site manager or to a central or on-site IT department. PSAPs may end up explaining the problem to multiple people, multiple times.
  - For **large businesses or institutions**, getting the issue in front of the right person is often more complicated. In these cases, approaching security directors, emergency managers, or leaders of an organization may be required for an IT department to act and apply the necessary resources to resolve the issue.
- ✓ **Share MLTS resources.** Often education is what is needed. Share the supporting MLTS documentation and resource links provided by the SECB NG9-1-1 Committee to guide MLTS owners/operators in better understanding their responsibilities.
- ✓ **Explain the impact the issue has on the PSAP.** It is important to convey how the issue affects response times and presents challenges for the PSAP in getting help to the caller as quickly as possible.
- ✓ **Be clear it is the MLTS owner/operator's responsibility to resolve the issue and comply with requirements.** Each business phone system is unique. It is advisable to limit PSAP engagement to raising

awareness with the MLTS operator that they have a 9-1-1 issue. It is not public safety's role to troubleshoot these complex systems and provide potential technical solutions. How the MLTS owner/operator resolves the issue, whether by adjusting phone system configurations internally or by engaging vendors such as their telecom network service provider, equipment vendor, or a 9-1-1 solution provider, is not a PSAP's responsibility.

- ✓ **Offer to assist with test calls.** Often the MLTS owner/operator will need to perform test 9-1-1 calls to diagnose the problem and test solutions. Provide a point of contact for scheduling test calls. Share the SECB guidance on 9-1-1 testing for MLTS.

## Follow-up and Escalate the Issue (as needed)

### Completion Testing

- ✓ **Confirm issue closure.** When receiving notice that the issue is resolved, if the PSAP has not been involved in previous testing, it is best practice to follow up with the MLTS owner/operator and have 9-1-1 test calls to confirm the issue is resolved to the PSAP's satisfaction. Make sure to confirm accurate call routing, callback number, street address, and dispatchable location information from various sites (as appropriate.)

### Persistence

- ✓ **Reach out regularly.** Be clear when the PSAP intends to follow-up next with the business/institution.
- ✓ **Keep documentation.** Recording the history of interactions with MLTS owners/operators may prove to be a good resource.

### Escalations

Often, getting MLTS issues resolved is not quick. The issue may require a PSAP's persistent follow-up, including escalation when the PSAP deems appropriate. **Possible escalation considerations:**

- ✓ **Use more formal communication methods.** Consider changing the message tone, switching from email to phone call, switching to formal letterhead notice, or having higher levels in the PSAP management structure perform the outreach. Consider having standard message content ready for use in these situations.
- ✓ **Escalate within the business/institution.** Specifically ask for the issue to be escalated and find out the contact info of the next level. Consider going to higher levels of general management if previous dealings were only with the IT department/staff.
- ✓ **Escalate within the PSAP management structure.** Notify the MLTS owner/operator that the issue has been reported to higher level(s) such as the PSAP Director, Sheriff, etc.
- ✓ **Schedule an on-site visit.** Have the local police/sheriff or fire marshal make an on-site visit to talk to management about the issue and the importance of getting it resolved.
- ✓ **Bring in other 9-1-1 authorities.** Notify the MLTS owner/operator that the issue has been reported to the MESB (if metro region) and/or MN Department of Public Safety ECN staff.
- ✓ **File a complaint with the FCC.** Complaints related to location accuracy or a provider's lack of responsiveness can be referred to the [issue submission form](#) at the [FCC Public Safety Support Center](#).

## Resources on 9-1-1 Compliance for MLTS

### Federal Resources

#### Federal Communications Commission Public Safety Support Center

- **Web:** <https://www.fcc.gov/general/public-safety-support-center>

- **Email:** [publicsafetycenter@fcc.gov](mailto:publicsafetycenter@fcc.gov)
- **Emergency Issues (24/7):** Phone: (202) 418-1122 *FCC's Operations Center*
- **Non-Emergency Public Safety or Licensing Issues:**  
Phone: (877) 480-3201 TTY: (717) 338-2824

### National 9-1-1 Program

- **Web:** <https://www.9-1-1.gov/issues/>
- **Email:** [nhtsa.national9-1-1@dot.gov](mailto:nhtsa.national9-1-1@dot.gov)

### State/Regional Resources

#### MN Department of Public Safety 9-1-1 Program:

- *Program Manager, Sandi Stroud, [sandi.stroud@state.mn.us](mailto:sandi.stroud@state.mn.us)*
- *Program Support, Steve Tait, [steve.tait@state.mn.us](mailto:steve.tait@state.mn.us)*
- *PSAP Support, Jill Bondhus, [jill.bondhus@state.mn.us](mailto:jill.bondhus@state.mn.us)*
- *PSAP Support, Mark Lallak, [mark.lallak@state.mn.us](mailto:mark.lallak@state.mn.us)*

#### Metropolitan Emergency Services Board (Anoka, Carver, Chisago, Dakota, Hennepin, Isanti, Ramsey, Scott, Sherburne, and Washington Counties):

- *Regional 9-1-1 Manager, Jake Jacobson, [rjacobson@mn-mesb.org](mailto:rjacobson@mn-mesb.org)*

### MLTS 9-1-1 Solution Providers

There are many consultants and vendors providing assessments and solutions for MLTS 9-1-1 compliance that can be identified via internet searches. It is recommended that an MLTS owner/operator engage with these providers as needed to implement solutions.

### Online Resources

- [MLTS 9-1-1 Requirements \(FCC.gov\)](#)
- [MLTS FAQs](#)
- [Dispatchable Location Requirements \(FCC.gov\)](#)
- [Dispatchable Location FAQs \(FCC.gov\)](#)
- [Kari's Law and Ray Baum's Act Requirements \(National 9-1-1 Program/FCC PDF\)](#)
- [Implementing Kari's Law and Section 506 of Ray Baum's Act Compliance Guide \(FCC.gov\)](#)
- [FCC Report and Order \(Aug. 1, 2019\) Implementing Kari's Law and Section 506 of RAY BAUM'S Act](#)
- [Federal 9-1-1 Regulations 47 CFR Subpart 9](#)
- [MN Statutes 403.15 Multiline Telephone System 9-1-1 Requirements](#)