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FCC 911 Requirements for Multi-Line Telephone Systems

Public Safety and Homeland Security Bureau
Federal Communications Commission

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Multi-Line Telephone Systems (MLTS) are telephone systems installed in office buildings, schools and college campuses, hotels, and similar environments to serve employees, residents, students, and guests. A typical office-based MLTS system enables employees to communicate with co-workers on the premises, while a typical hotel-based system enables hotel guests to call other guests or hotel staff. In addition, MLTS systems allow users to make calls to outside telephone numbers, including emergency calls to 911.

Ensuring that these systems fully support 911 is essential to protecting the life, health, and safety of people that work, visit, or live in these environments. For example, if an MLTS user calls 911 to report that a person in an office building is having a medical emergency or a campus is threatened by an active shooter, it is vitally important for the 911 call to reach the nearest 911 call center without delay and provide precise information about the caller's location to assist first responders.

This is not only important to save lives – it's the law. The Federal Communications Commission (FCC) adopted rules for 911 calls from MLTS pursuant to two federal statutes – Kari's Law and Section 506 of RAY BAUM'S Act. Kari's Law is named in honor of Kari Hunt, who was killed by her estranged husband in a motel room in Marshall, Texas in 2013. Ms. Hunt's 9-year-old daughter tried multiple times to call 911 from the motel room phone, but the call never went through because she did not know that the motel's phone system required dialing "9" for an outbound line. Congress responded to this tragedy in 2018 by enacting Kari's Law, which requires direct 911 dialing and notification capabilities for MLTS, and Section 506 of RAY BAUM'S Act, which directed the FCC to conduct a rulemaking to consider adopting rules concerning the caller location information that must be conveyed with 911 calls, including calls from MLTS. The FCC adopted rules in 2019.

Under these rules, MLTS installers, managers, and operators must ensure that the MLTS:

- Allows direct dialing of 911, without a requirement for the caller to dial any prefix or access code such as the number 9;
- Provides central notification that a 911 call has been made; and
- Provides certain information about the caller's location with the 911 call so that first responders can quickly locate the caller.

The following pages provide additional information on these requirements, including a decision tree to help you determine whether you are subject to the rules, exemptions that may apply, and where to find additional guidance and resources to assist you.

The FCC's Public Safety and Homeland Security Bureau is providing this fact sheet to help interested parties understand and comply with the rules. This document does not replace, supersede, or modify the rules.

Questions and Answers on 911 for MLTS Installers, Managers, and Operators

Q: Why do the FCC's 911 Requirements for Multi-Line Telephone Systems (MLTS) matter?

A: These requirements help to protect the life and safety of the people who visit, work, or reside at your MLTS-equipped facility, such as guests, employees, students, residents, and customers. In addition, these requirements help first responders to provide emergency assistance. Compliance with these rules also is required by federal law that was inspired by a real-life tragedy resulting in the loss of life. Failure to comply could subject you to FCC enforcement action, including possible fines.

Q: What is an MLTS under the FCC's 911 rules?

A: An MLTS is a telephone system that includes more than one phone line and is typically used in enterprise settings such as hotels, offices, retail stores, and campuses. Under some circumstances, this can include communications platforms such as Microsoft Teams.

Q: Who is covered by the FCC's 911 MLTS rules?

A: The FCC's rules apply to MLTS manufacturers, importers, lessors, managers, operators, and installers. This fact sheet focuses on the requirements applicable to MLTS managers, operators, and installers.

Q: I am a manager, operator, or installer of an MLTS. Do the federal 911 regulations apply to me?

A: It depends. If your MLTS was installed on or before February 16, 2020, it may be exempt from federal regulations, but you should check whether any state laws on 911 apply. If your MLTS was installed after February 16, 2020, or if you have upgraded the hardware or software of the system since then, the MLTS may fall within the FCC's 911 rules.

Q: What constitutes an "upgrade" under the FCC's 911 MLTS rules?

A: Although not every minor improvement to a legacy MLTS would trigger the obligation to comply with the rules, upgrades to core MLTS software or hardware functions generally would be sufficient to bring an MLTS within the scope of the rules.

Q: What is required if I qualify as an MLTS manager, operator, or installer under the FCC's 911 rules?

A: MLTS managers, operators, and installers must set up the MLTS to enable a user to dial 911 directly, without having to dial any additional digit(s), such as "9," for an outside line. Next, the MLTS must provide notification that a 911 call has been made to a central location such as a front desk or security office. Finally, the MLTS must provide information about the 911 caller's location to help first responders locate the 911 caller quickly.

Additional Resources

FCC MLTS Website - www.fcc.gov/mlts-911-requirements

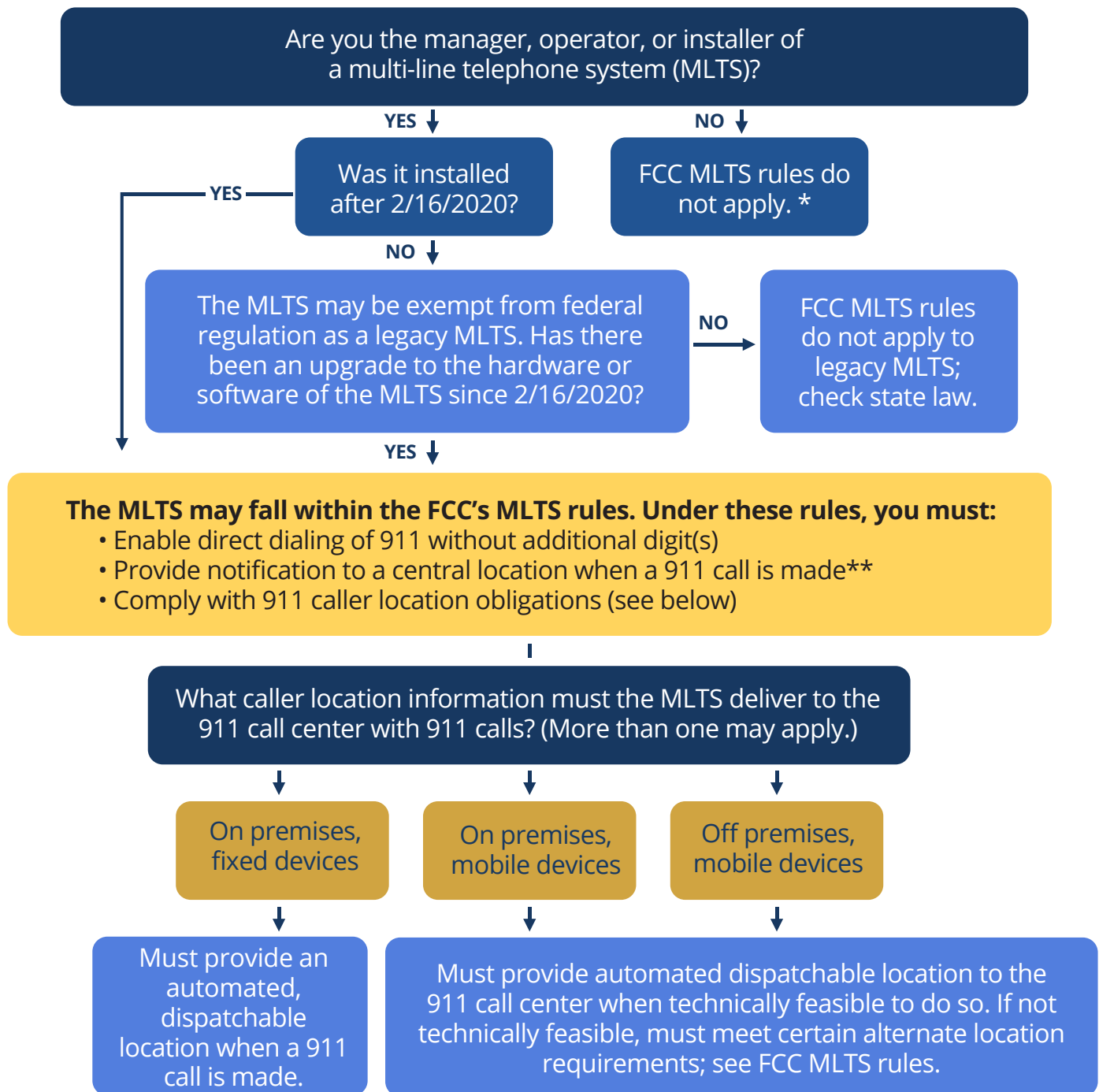
Frequently Asked Questions - www.fcc.gov/sites/default/files/mlts_faqs.pdf

- Public Safety Answering Points (PSAPs), also known as 911 call centers, and other public safety officials may contact the **Public Safety Support Center** (www.fcc.gov/general/public-safety-support-center) to report concerns or request support from the FCC.
- Consumers may file a complaint via the **Consumer Complaint Center** (consumercomplaints.fcc.gov) and select Emergency Communications for 911 issues.





Decision Tree for MLTS Managers, Operators, and Installers



The FCC's MLTS rules (47 CFR part 9, subpart F) implement Kari's Law and Section 506 of RAY BAUM'S Act, two federal statutes signed into law in 2018. The rules require MLTS manufacturers, vendors, lessors, installers, managers, and operators to ensure that MLTS users can complete 911 calls without dialing any additional digits for an outside line and help first responders find those in need of immediate assistance when responding to emergencies.

* However, certain FCC MLTS rules apply to MLTS manufacturers, importers, sellers, and lessors.

** Notification obligations may not apply in all circumstances; see FCC MLTS rules to determine applicability.



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