



STATE OF MAINE  
PUBLIC UTILITIES COMMISSION

## Multi-Line Telephone System (MLTS) Fact Sheet

This Fact Sheet provides information on two Federal laws enacted to make it easier for callers to reach 911 and for emergency services to locate 911 callers:

- 1) Kari's Law - Requires MLTS a) be preconfigured to enable users to dial 911 directly, without having to dial a prefix (such as a "9") to reach an outside line, and b) convey a notification that a 911 call has been made
- 2) Ray Baum's Act - Requires that "dispatchable location" information (the validated street address plus additional information such as suite, floor number or similar information necessary to adequately identify the location of the calling party) is conveyed with 911 calls so first responders can more quickly locate 911 callers

### General Questions

Q. What are MLTS?

A. MLTS are communications systems typically used in places such as hotels, offices and campuses.

Q. What persons or entities associated with a MLTS are covered by Kari's Law and the Ray Baum's Act?

A. Persons engaged in the business of manufacturing, importing, selling, leasing, installing, managing, or operating a MLTS. Maine enacted a Kari's Law statute before the Federal law was enacted which focused only on installers or operators ([25 M.R.S. § 2934-A](#)).

Q. With the passage of these laws is it possible that people may still have to dial "9" first before calling 911 from one of these MLTS?

A. Yes. Because the statutes are not retroactive, some hotels, workplaces, and other locations may have legacy MLTS equipment that still requires dialing an extra digit to call 911. If people are unfamiliar with the phone system in these settings they should ask about how the system handles dialing 911. MLTS operators are also strongly encouraged to include labels or warnings regarding the 911 capabilities of legacy MLTS.

### Kari's Law

Q. Does the direct dialing requirement apply to all MLTS or are some systems grandfathered?

A. Under Maine's Kari's Law statute, enacted in 2017, systems had to comply with the direct dialing requirement by November 1, 2018 or if the entity did not have a MLTS capable of complying by that date, then when the system was next upgraded to a system capable of complying. The Federal law, enacted in 2018, applies to all MLTS in the U.S. that are manufactured, imported, offered for first sale or lease, first sold or leased, or installed after February 16, 2020.

Q. Does the Federal law require more than the Maine law?

A. Yes. The Federal law also requires installers, managers and operators of MLTS to provide notification, such as to a front desk or security office, when a 911 call is made in order to facilitate building entry by first responders. The notification is intended to help signal someone that an emergency response is coming so that they may prepare for first responders by, for example, checking on the victim, opening a gate or unlocking a door.

*Notification Destination:* The MLTS must be configured to notify a central location on-site or off-site where someone is likely to see or hear the notification. Example: A hotel can send a text message to an overnight employee's mobile device.

*Examples of notification:* Include conspicuous on-screen messages with audible alarms for security desk computers using a client application, text messages for smartphones, and email for administrators. Businesses have the flexibility to send the notification by text, email, audio message, or any other form of notification that suits their needs.

*Required Information:* Notification shall include, at a minimum, the fact that a 911 call has been made. If technically feasible, the notification must also contain (1) a valid callback number, and (2) the same caller location information that the MLTS conveys to the Public Safety Answering Point (PSAP) with the 911 call.

*Timing:* The MLTS notification must be initiated simultaneously with the 911 call if it is technically feasible to do so. The notification must not delay the call to 911 under any circumstances.

Finally, the MLTS notification is required provided the system is able to be configured to provide the notification without an improvement to the hardware or software of the system. An improvement to the hardware or software of the system includes upgrades to the core systems of the MLTS, as well as substantial upgrades to the software and any software upgrades requiring a significant purchase.

### Ray Baum's Act

Maine has required that dispatchable location information (e.g., street address, room number) be provided with 911 calls from MLTS since 2005 ([Chapter 11](#) of the Maine Public Utilities Commission's Rules). These requirements apply to premises-based systems (at the office or on campus) and apply to MLTS introduced or installed, or substantially upgraded, on or after July 27, 2005).

Q. What are the dispatchable location requirements for MLTS under the new Federal law?

A. It depends on the type of MLTS telephone or device being used to make the call.

*MLTS 911 calls from fixed devices (e.g., wired desk phone)* - By January 6, 2021, on-premises fixed devices associated with a MLTS must provide an automated dispatchable location<sup>1</sup> with each 911 call.

*MLTS 911 calls from non-fixed devices (e.g., cordless office phone)*

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<sup>1</sup> Automated dispatchable location means dispatchable location that is generated automatically, without action by the 911 caller.

*On-premises, non-fixed devices associated with MLTS* - By January 6, 2022, MLTS must provide automated dispatchable location, if technically feasible. Otherwise, they must provide either

- (1) dispatchable location provided manually by the end user or
- (2) alternative location information, which may be coordinate-based (latitude and longitude, and where available, vertical location) and must be sufficient to identify the caller's civic address and approximate in-building location, including floor level, in large buildings.

*Off-premises (at home) non-fixed devices associated with MLTS* - By January 6, 2022, MLTS must provide automated dispatchable location, if technically feasible. Otherwise, they must provide either:

- (1) dispatchable location provided manually by the end user or
- (2) enhanced location information, which may be coordinate-based, consisting of the best available location that can be obtained from any available technology or combination of technologies at reasonable cost.

Q. Under what circumstances does providing a 911 caller's "dispatchable location" require information beyond the caller's validated street address?

A. The definition of "dispatchable location" is functional and varies significantly depending on the environment from which a 911 call originates and the amount of information needed to adequately identify the caller's location. For MLTS calls placed from multi-story buildings or campus environments, dispatchable location will typically require specific floor and room information in addition to the street address. On the other hand, for MLTS calls placed from many small businesses, a validated street address alone may constitute dispatchable location because it provides first responders all the information, they need to quickly locate the caller.

Additional Resources:

[Federal Communications Commission \(FCC\) MLTS Webpage](#)

[Federal Kari's Law](#)

[Ray Baum's Act](#)

[Implementing FCC Regulations](#)

**If you have questions, please contact the Maine Public Utilities Commission  
Emergency Services Communication Bureau at (207) 287-3831**