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Updated Requirements for Multi-Line Business Phones

Typically used in offices, hotels, hospitals, etc., to provide multiple phone lines within one building, multi-line telephone systems (“MLTS”) are the subject of two new federal laws: [1] Kari’s Law and [2] the Ray Baum Act.

Kari’s Law ensures that guests can dial 911 and contact emergency services from any phone line in a hotel without dialing another digit to dial out. The law applies to MLTS “manufactured, imported, offered for sale or lease, or installed” after February 16, 2020, and mandates that those “in the business of installing, managing, or operating” MLTS cannot continue to work on or with systems that require a dial-out prefix. It also requires MLTS to provide notification to the front desk or security office at the same time the 911 call is made. The notification must include:

- The fact that a 911 call has been made;
- A callback number [unless technically unfeasible]; and
- Information about the caller’s location, relayed by the MLTS to 911 [can route to internal offices if a direct line is technically unfeasible].

Entities upgrading existing systems may be required to comply with these regulations. The FCC will provide clarification on a case-by-case basis.

The Ray Baum’s Act is a broad piece of legislation designed to increase safety and access to digital services. The Act establishes new rules for phone systems installed after or in use as of late 2021. Section 506 of the Ray Baum Act requires phone service providers to provide the street address of the calling party and information such as room number, floor number, or similar information to adequately identify the calling party’s location. For off-premises 911 calls, the MLTS operator or manager must provide:

- A dispatchable location [if technically feasible],
- Manually-updated dispatchable location [if technically feasible], or
- Enhanced location information consisting of the best available location that can be obtained from any available technology or combination of technologies at reasonable cost.

The [FCC’s MLTS guidelines](#) can shed further light on these systems. As always, contact your Stokes Wagner attorney with any questions.

Questions? Contact Stokes Wagner.