

# Questions and Answers on Compliance with Kari's Law and RAY BAUM'S Act

## FCC Call routing regulations

**Q** **How does Kari's Law apply to enterprise Multiline Telephone Systems (MLTS)?**

**A** Kari's Law requires:

1. That MLTS be configured so callers can place 911 emergency calls without the need to dial a prefix; and
2. That MLTS be configured to notify a secondary party (inside, or optionally outside the enterprise) that an emergency call is being made.

**Q** **How does RAY BAUM'S Act apply to an enterprise MLTS?**

**A** RAY BAUM'S Act requires an MLTS to send dispatchable location information given during a 911 call to the Public Safety Answering Point (PSAP).

**Q** **How does the new National Suicide Prevention Lifeline impact MLTS?**

**A** On July 16, 2020, the FCC adopted rules to establish 988 as a nationwide, 3-digit dialing code for Americans in crisis to connect

with suicide prevention and mental health crisis counselors. Starting July 16, 2022, an MLTS must be able to process 988 as an emergency call, to be routed to the National Suicide Prevention Lifeline. Also on this date, all calls to non-emergency external numbers in North America will require 10-digit dialing (area code + number), including calls to local area numbers. Users should be directed to dial 10-digits for all domestic calls.

**Q** **What is the effective compliance date for Kari's law?**

**A** Compliance with Kari's Law goes into effect on February 16, 2020.

**Q** **How does Cisco help enterprises meet Kari's Law and RAY BAUM'S Act compliance for Cisco Unified Communications Manager oriented calling?**

**A** Cisco provides direct capabilities within the Cisco® Unified Communications Manager (UCM) and Cisco Emergency Responder (CER) products to help enterprises be compliant with these laws. We strongly recommend contacting your legal counsel to determine your specific compliance obligations.

**Q** **Where on the FCC website can I read more about these laws?**

**A** For information about Kari's Law and RAY BAUM'S Act, see the FCC posting at: <https://docs.fcc.gov/public/attachments/FCC-19-76A1.pdf>.

For information about the Suicide Prevention Lifeline, see the FCC posting at: <https://www.fcc.gov/suicide-prevention-hotline>.

## New deployments

**Q** **What version of Cisco Unified Communications Manager (UCM) will include direct 911 and 988 dialing?**

**A** Cisco UCM allows administrators to configure any emergency dial pattern, including a direct 911 dial pattern. Starting with UCM Releases 11.5 SU8 and 12.5 SU3, Cisco has added configuration check and guidance for direct 911 dialing route patterns, as part of the installation in US specific time zones (where Federal Regulations may apply). If the system already has a direct 911 dialing pattern available, then there will be no changes to the GUI interface.

For 988 dialing, we offer native support for UCM Releases 14 SU2 and 11.5 SU11. All other releases are supported using COP files.

**Q** **What post-installation operations do I need to complete to help me meet [Kari's Law obligations](#)?**

**A** After completing installation and configuring a direct 911 dial pattern, the installer should schedule a maintenance window with any and all local Public-Safety Answering Points (PSAPs) to verify that dialing 911 from a few phones will route directly and reach the correct PSAP. If testing compliance to [RAY BAUM'S Act](#) at the same time, after reaching the PSAP, ask the dispatch agent to verify the dispatch address for the calling device.

**Q** **I have common-area phones (lobby phones) which do not have Direct Inward Dialing numbers (DIDs). Does Cisco have a solution to help me comply with Kari's Law and RAY BAUM'S Act?**

**A** Yes. The ability to dial 911 directly is required for common-area phones, like lobby phones. Cisco Emergency Responder helps track such phones, similarly and provide emergency treatment, based on the location of the caller so that the PSAP can identify the location of the caller and even call them back, in the event the original 911 call is disconnected.

**Q** **I have remote workers/users. How do these laws apply to them?**

**A** Remote workers, or users may not be subject to the same requirements as on-premises users (at this time), due to lack of access to their location information and lack of control over their device (may require connecting via a third-party access point that is outside the control of the enterprise). Additional information may be found in the FCC's final rules (<https://www.federalregister.gov/documents/2019/12/05/2019-20137/implementing-karis-law-and-ray-baums-act-inquiry-concerning-911-access-routing-and-location-in>).

**Q** **I don't have Cisco Emergency Responder. How do I order it?**

**A** Cisco Emergency Responder can be ordered separately using Product Number: EMRGNCY-RSPNDR.

Refer to the Cisco Unified Communications Solutions Ordering Guide at <https://www.cisco.com/c/dam/en/us/products/collateral/unified-communications/unified-communications-manager-callmanager/guide-c07-739476.pdf> to learn more on how to order Cisco Emergency Responder.

If ordering User Connect Licensing (UCL), User Workspace Licensing (UWL) and Cisco Business Edition 6000 configurations in Cisco Commerce Workspace (CCW) , it allows for the selection of CER software and license options. Refer to the Ordering Guide at <https://www.cisco.com/c/dam/en/us/products/collateral/unified-communications/unified-communications-manager-callmanager/guide-c07-739476.pdf>.

Cisco Emergency Responder is included with the Flex Order Enterprise Agreement – Calling for On-premises, Hosted, or UCM Cloud. Flex Named User Calling customers can order CER as an add-on under Calling Services.

Refer to the Cisco Collaboration Flex Plan ordering guide at: <https://www.cisco.com/c/dam/en/us/products/collateral/customer-collaboration/cisco-collaboration-flex-plan-ordering-guide.pdf> for more information.

**Q I am a Cisco Collaboration Flex Plan customer. How do I get Cisco Emergency Responder?**

A Cisco Emergency Responder is included with the Flex Order Enterprise Agreement – Calling for On-premises, Hosted, or UCM Cloud. Flex Named User Calling customers can order Cisco Emergency Responder as an add-on under Calling Services. Refer to the Cisco Collaboration Flex Plan ordering guide at <https://www.cisco.com/c/dam/en/us/products/collateral/customer-collaboration/cisco-collaboration-flex-plan-ordering-guide.pdf> for more details on how to get Cisco Emergency Responder.

**Q I plan to have the same UCM cluster serve non-U.S. offices. How do I handle emergency calls from those users?**

A Kari's Law and RAY BAUM'S Act only apply to U.S. locations. Cisco Emergency Responder helps identify non-US location phones through an IP subnet and removes non-US location phones from tracking and accounting for licenses.

## Existing deployments

**Q I currently have no plans to upgrade UCM. What can I do to meet compliance with the new laws?**

A Since direct dialing to 911 is available in any version of Cisco UCM, Cisco recommends that all customers configure their existing deployments to support a direct 911 dialing pattern. We strongly recommend contacting your legal counsel to determine your specific compliance obligations.

**Q I currently don't have Cisco Emergency Responder with UCM. What are my options for notification?**

A Since there is no native notification capability in UCM that allows a customer to satisfy Kari's Law, customers will need to use an application to meet this aspect of the law. Some options that can be used to meet the notification section of Kari's Law include:

- [Cisco Emergency Responder](#)
- RedSky's E911 Anywhere solution
- Intrado's Emergency Routing Gateway Service

**Q My customer uses Extension Mobility. How do I ensure those callers are compliant for Kari's Law and RAY BAUM'S Act?**

A Cisco Emergency Responder tracks users and devices as they physically move between buildings and ensures the correct location identification is sent to the emergency services dispatch center. Since the dispatch address for an emergency call is based on the physical location of the calling party, any U.S. site that has been properly configured in Cisco Emergency Responder will be able to ensure Extension Mobility user information is made available.

**Q I have Extension Mobility Cross Cluster (EMCC) deployed. Can Cisco Emergency Responder help me meet compliance?**

**A** Yes. In customer deployments that allow for user mobility between clusters, Cisco Emergency Responder can be configured to support both Kari's Law and RAY BAUM'S Act. In an EMCC deployment, Cisco Emergency Responder servers will work together to track devices as they log in to phones that are registered to another cluster via Extension Mobility. This ensures that all users will have direct access to 911 services as well as the correct address for emergency services dispatch. And notification will allow local resources to receive notification, even if the calling party is registered to another cluster.

**Q I have Cisco Jabber users connected over Mobile and Remote Access (MRA). How can I track them when they are on the premises?**

**A** Jabber clients that use MRA for connectivity while on premises can be tracked using the Location Awareness feature in UCM. This can be accomplished by the Jabber administrator putting a corporate wireless SSID into the whitelisted SSID in the Jabber configuration file. Once configured, when the Jabber client is associated with the enterprise SSID, Jabber will send the upstream access point information to UCM so that the device client can be tracked to the access point, even when using MRA for UCM registration.

## UCM: Scenarios for an emergency caller

**Q I have analog phones. What do I need for these devices?**

**A** Analog phones are not tracked in the same manner as wired and wireless phones. To provide accurate location information. When using Cisco Emergency Responder, analog phones can be tracked either by the IP subnet of the Foreign Exchange Subscriber (FXS) device or by manually defining the directory number in Cisco Emergency Responder.

**Q I have third-party phones or Cisco phones behind third-party switches. How do I comply with the law?**

**A** Cisco Emergency Responder requires Cisco Discovery Protocol (CDP) support on phones, to provide switch port-based tracking. Any Cisco phones connected to third-party switches or third-party phones connected to Cisco switches can be tracked via their IP subnet or through manual definition.

**Q I am in a non-U.S. UCM cluster but have users in the United States. How do I ensure compliance for those users?**

**A** Kari's Law and the RAY BAUM'S Act apply to any company that has U.S.-based facilities. Any emergency call from a user who is working in an enterprise location in the U.S. must be able to dial 911 directly, even if the UCM call processing nodes are deployed outside the U.S. Notification of any emergency call place by a caller in the U.S. should be generated irrespective of where the call control servers reside. We strongly recommend contacting your legal counsel to determine your specific compliance obligations.

**Q How can I prevent accidental 911 calls?**

**A** Due to the similarity of prefix-based offnet calling and the 911 emergency number, accidentally calling 911 can happen. In order to balance actual 911 calls with mis-dialed 911 calls, Cisco has a call flow that will insert a short notification announcement prior to routing the call to emergency services. The announcement can be a short message or a single ringtone. The notification should be as short as possible to minimize the delay in reaching emergency services. The Application Note—911 Call Announcement—for this call flow can be found at: <https://community.cisco.com/t5/collaboration-voice-and-video/911-call-announcement/ta-p/3203809>.

## Emergency call notifications

### **Q** What is defined as notification by Kari's Law?

**A** Kari's Law is not explicit as to the method of notification, but it allows for the installers, managers, and operators to use an "efficient and cost-effective notification solution." Some examples of notification solutions include visual alerts on monitors, audible alarms, text and email messages, phone calls and, a network-based application. Cisco Emergency Responder's use of phone calls and Cisco Emergency Responder's ER user pages satisfy Kari's Law's notification requirement. We strongly recommend contacting your legal counsel to determine your specific compliance obligations.

### **Q** What information must be included in the notification?

**A** Yes, Kari's Law specifies that the minimum information that must be included in a notification includes: 1) The instance of a 911 call being placed; 2) a valid callback number; and 3) information about the caller's location. Additional information may be included in a notification, but any notification must include these three items at a minimum. We strongly recommend contacting your legal counsel to determine your specific compliance obligations.

### **Q** Where should the notification go? Who can be notified?

**A** The notification should go to a central location at the facility where the system is installed or to another person or organization regardless of location.

### **Q** How do I ensure an accurate dispatchable location at the PSAP?

**A** Any emergency call handling product should be audited to ensure accurate and correct location information is confirmed by the PSAP. Cisco recommends that customers schedule a test window with their local PSAPs at least annually to confirm the transmission of emergency calls to the PSAP and confirm the dispatch location. Any test call to the PSAP should be arranged ahead of time so the PSAP is aware that a customer will be testing their emergency calling system.