

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Implementing Kari’s Law and)	PS Docket No. 18-261
Section 506 of RAY BAUM’S Act)	
)	
Inquiry Concerning 911 Access,)	PS Docket No. 17-239
Routing, and Location in Enterprise)	
Communications Systems)	

REPLY COMMENTS OF COMCAST CORPORATION

Comcast Corporation (“Comcast”) hereby submits these reply comments in response to the Notice of Proposed Rulemaking released by the Federal Communications Commission (“FCC” or “Commission”) in the above-captioned proceeding.¹

I. INTRODUCTION AND SUMMARY

Comcast applauds the Commission’s ongoing work to implement the direct dialing obligations of Kari’s Law. In fact, Comcast recognized the importance of configuring the multi-line telephone systems (“MLTS”) it installs with direct dialing to 911 long before the passage of Kari’s Law. As a result, 100 percent of Comcast-installed MLTS equipment in use today enables callers to reach a PSAP by dialing 911.

Comcast also supports the adoption of a notification requirement in circumstances where that information is likely to assist first responders in locating the origin of the emergency call. To that end, the Commission should focus such obligations on MLTS

¹ *Implementing Kari’s Law and Section 506 of RAY BAUM’s Act; Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems*, Notice of Proposed Rulemaking, FCC 18-132 (rel. Sept. 26, 2018) (“NPRM”).

networks serving larger enterprise customers where a notification would enable those customers to assist first responders. The Commission, however, should give MLTS managers, operators, and customers flexibility to customize the form, content, and mechanics of the notification.

Finally, the Commission's rules should clearly delineate the compliance responsibilities of every entity involved in deploying, providing, and operating MLTS that are subject to the requirements of Kari's Law and RAY BAUM'S Act. In particular, each entity should be responsible only for the matters within its control.

II. THE COMMISSION SHOULD ADOPT A NOTIFICATION REQUIREMENT FOR MLTS INSTALLED AT LOCATIONS WHERE THE OBLIGATION IS LIKELY TO ASSIST FIRST RESPONDERS

Comcast agrees with the Commission that the simultaneous delivery of a notice to a central, on-site location with information when a 911 call is placed from a MLTS can reduce the time required for first responders to identify the specific source of the call.² MLTS serving large enterprise customers may involve hundreds or thousands of employee locations spread over thousands of square feet or multiple floors in a single building. In those circumstances, an on-site notification requirement will alert the enterprise that a 911 call has been placed and enable the enterprise to assist first responders by directing them to or facilitating access to the specific location where the call originated or assistance is needed.

Other MLTS, however, serve much smaller enterprise customers where the imposition of a simultaneous notification requirement would cause those customers to

² *Id.* ¶ 19.

incur an unnecessary expense and would be of little, if any, value to the enterprise or the first responders. As NCTA noted, Comcast’s Business Voice and VoiceEdge Select offerings serve an average of four or fewer lines per customer location.³ In such cases, all of the employees are likely located within a small area and would be well aware that a 911 call has been placed. First responders, similarly, would have little difficulty in locating the origin of the call in those circumstances.

Several commenting parties recognize the need to target the notification requirement to MLTS serving large enterprise customers.⁴ For example, RingCentral notes that “the legislative history makes clear that the focus of the notification and dispatchable location requirement is large enterprise settings where the enterprise controls the network.”⁵ Accordingly, the Commission should clarify that the definition of MLTS applies only to systems with ten or more lines and should adopt a size exemption for businesses under 40,000 square feet. By doing so, the Commission would better focus the on-site notification requirement on enterprise customers where the notice is likely to be beneficial to first responders and MLTS users.

³ NCTA – The Internet & Television Association Comments at 4. Unless otherwise noted, all comments cited herein were filed in PS Docket No. 18-261 on December 10, 2018.

⁴ See AT&T Comments at 5 (“[T]he Commission should establish that businesses under 40,000 square feet . . . are exempted from the central notification rules.”); NCTA – The Internet & Television Association Comments at 5 (“The Commission . . . should . . . exclude systems with fewer than ten lines from the notification obligation and should consider adopting a business size exemption.”).

⁵ RingCentral Comments at 7.

Comcast also agrees with commenting parties that urge the Commission to give equipment providers and end users flexibility to customize the mechanics, form, and content of the 911 notification message.⁶ For example, the American Hotel & Lodging Association notes that an on-site notification is appropriate, “provided that hotels have sufficient flexibility to implement the notification requirement in a manner consistent with the technical capability of the MLTS installed and the hotel’s operational preferences.”⁷ Similarly, the Ad Hoc Telecommunications Users Committee urges the Commission to afford “adequate discretion for the MLTS operator to shape the content of any simultaneous notification of a 911 call so that it contains the information that best supports prompt emergency response.”⁸ The Commission, thus, should not adopt prescriptive rules that would unreasonably constrain the ability of MLTS managers, operators, and customers to implement a notification requirement in a manner that is tailored to their particular circumstances.

III. THE COMMISSION’S RULES SHOULD CLEARLY DELINEATE THE RESPONSIBILITIES OF THE VARIOUS PARTICIPANTS INVOLVED IN DEPLOYING, PROVIDING, AND OPERATING MLTS

In adopting rules to implement Kari’s Law and RAY BAUM’S Act, the Commission should specify the responsibilities of each entity involved in selling,

⁶ See, e.g., Cisco Systems Comments at 13; Panasonic Corporation of North America Comments at 11 (“[T]he Commission should emphasize flexibility for a given enterprise to determine the content, form, and destination of the notification.”); Telecommunications Industry Association Comments at 10-12. See also NPRM ¶ 22 (seeking comment on whether to “allow enterprises the flexibility to customize notification[s]”).

⁷ American Hotel & Lodging Association Comments at 3; see also *id.* at 6-8.

⁸ Ad Hoc Telecommunications Users Committee Comments at 4-5; see also *id.* at 5-7.

installing, managing, and owning MLTS.⁹ Moreover, these responsibilities should be commensurate with each entity's role in providing the MLTS.

Kari's Law. In instances where an MLTS provider installs a system that has been pre-configured to be capable of transmitting direct-dialed 911 calls to the appropriate PSAP, the Commission should make clear that the installer has fulfilled its responsibilities under the Kari's Law statute and the FCC's implementing rules.¹⁰ Similarly, the FCC should recognize that enterprise customers may control the routing of calls. In such circumstances, the Commission should state clearly that the enterprise's voice service provider has fulfilled its responsibilities under the statute and implementing regulations if it ensures that its service will not interfere with the customer's ability to configure the MLTS to be capable of transmitting direct-dialed 911 calls.¹¹

With respect to any notification obligation, the Commission should implement USTelecom's suggestion to "make clear that a system installer, manager, or operator has fulfilled its obligation under Kari's Law so long as the system is properly configured to allow notification transmission to a centralized location, even if a customer declines to designate one."¹² As AT&T recognizes, "[c]ustomers may not wish to have central

⁹ See, e.g., RingCentral Comments at 9 ("Because owners and operators play such a critical role in administering their MLTS, the Commission should ensure that the lines between manufacturers, installers and owners/operators are clearly drawn."); Telecommunications Industry Association Comments at 13 ("The Commission should address who will bear responsibility for compliance with Kari's law.").

¹⁰ See, e.g., NCTA – The Internet & Television Association Comments at 2.

¹¹ For example, if the customer separately purchases a PBX and trunking service to interconnect to the PSTN, the trunk service provider's obligation should be satisfied if the trunking service does not prohibit 911 direct dialing.

¹² USTelecom – The Broadband Association Comments at 4.

notification if, for example, they have a small facility or they do not have staff to support monitoring notifications at all hours.”¹³

Further, to the extent a notification obligation is applied to MLTS, that requirement should extend only to 911 calls placed from a telephone at the location where the MLTS facilities have been installed. Any notification capability for users that are located off-site should be determined by the MLTS customer.¹⁴ As RingCentral recognizes regarding distributed workforces, “there may be no centralized location to receive a 911 call notification, the centralized location may be miles or states away from the emergency and have no special knowledge of the location where the emergency arose, or a single multi-line voice system may be deployed at multiple locations.”¹⁵

RAY BAUM’S Act. Any rules adopted to implement RAY BAUM’S Act also must recognize the essential role that enterprise customers play in furnishing accurate location information. As parties emphasized in the initial comments, MLTS operators and managers will need the assistance of their enterprise customers to acquire and maintain accurate dispatchable location information.¹⁶ When a customer has the ability to move MLTS stations to new locations without the knowledge of the MLTS operator or voice service provider, the Commission should not hold the latter parties responsible for

¹³ AT&T Comments at 7-8.

¹⁴ RingCentral Comments at 3-5.

¹⁵ *Id.* at 4.

¹⁶ *See, e.g.,* AT&T Comments at 8-9 (“Customers are in the best position to confirm whether their specific address information is ‘dispatchable’ Even after system installation, customers may have the ability to unilaterally move telephone stations to different locations[.]”).

ensuring the accuracy of the dispatchable location of a 911 call placed from such a system.

IV. CONCLUSION

Consistent with the foregoing reply comments, the Commission should implement the requirements of Kari's Law and RAY BAUM'S Act in a manner that will advance the public interest goals of facilitating the public's access to emergency response resources, assisting first responders, and clearly defining the responsibilities of firms involved in deploying, managing, and using MLTS.

Respectfully submitted,

/s/ Kathryn A. Zachem

Kathryn A. Zachem

Beth A. Choroser

Regulatory Affairs

COMCAST CORPORATION

300 New Jersey Avenue NW, Suite 700

Washington, DC 20001

A. Richard Metzger, Jr.

Emily J. H. Daniels

LAWLER, METZGER, KEENEY & LOGAN, LLC

1717 K Street NW, Suite 1075

Washington, DC 20006

Attorneys for Comcast Corporation

Brian A. Rankin

Richard A. Chapkis

Legal Regulatory Affairs

COMCAST CORPORATION

1701 JFK Boulevard

Philadelphia, PA 19103