



Brian Hurley
Vice President of Regulatory Affairs
ACA Connects–America’s Communications Association
2415 39th Place, NW
Washington, DC 20007

bhurley@acconnects.org
(202) 573-6247

April 22, 2019

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte* Communication of ACA Connects – America’s Communications Association; Implementing Kari’s Law and Section 506 of RAY BAUM’s Act, PS Docket No. 18-261; Inquiry Concerning 911 Access, Routing and Location in Enterprise Communications Services, PS Docket No. 17-239

Dear Ms. Dortch:

On April 18, 2019, Ross Lieberman, Sr. Vice President of Government Affairs for ACA Connects – America’s Communications Association (“ACA Connects”)¹ and I met with David Furth, Erika Olsen, Kenneth Carlberg, John Evanoff, Rasoul Safavian, Thomas Eng, and Nellie Foosaner of the Public Safety and Homeland Security Bureau (“Bureau”) to discuss the above-captioned proceeding.² During the meeting, ACA Connects discussed the proposals it raised in its comments and reply comments in the proceeding.

To start the meeting, ACA Connects said it applauds the Commission for its ongoing efforts to improve the nation’s 911 system. An important part of these efforts is ensuring that users of multi-line telephone systems (“MLTS”) have adequate 911 access, including location capability.

ACA Connects explained that it believes most of its members and many others in the industry provide 911 location capability for their MLTS customers by following practices similar

¹ ACA Connects was known previously as the American Cable Association.

² See *Implementing Kari’s Law and Section 506 of RAY BAUM’s Act*, PS Docket No. 18-261; *Inquiry Concerning 911 Access, Routing and Location in Enterprise Communications Services*, PS Docket No. 17-239, Notice of Proposed Rulemaking, 32 FCC Rcd 8984 (2018) (“NPRM”).

to those they follow in the context of interconnected VoIP.³ By following such practices, these operators are able to meet the “dispatchable location” standard set forth in RAY BAUM’s Act.⁴ ACA Connects further believes that such practices can satisfy the Commission’s proposed requirement that MLTS be “configured such that the dispatchable location of the caller is conveyed to the PSAP with 911 calls.”⁵ ACA Connects supports adoption of the proposed rule under the condition that the Commission affirm this interpretation.⁶ By doing so, the Commission can enshrine “dispatchable location” as the industry standard for 911 location in all MLTS environments, while also clarifying that the well-established practices that ACA Connects members and others follow are an acceptable means of complying with this standard.

As it explained in the meeting, ACA Connects does not contend that the practices discussed above are the only means of providing dispatchable location for MLTS. Nor does it suggest that the Commission mandate that installers, managers, or operators of MLTS follow such practices. On the contrary, ACA Connects believes the right approach is to give customers the flexibility to pursue MLTS technologies and solutions that meet their needs, provided that the “dispatchable location” standard is met.

Finally, ACA Connects urged the Commission to pursue adoption of a federal dispatchable location requirement for MLTS that does not add to, but rather strives to minimize, the complexity of compliance with state obligations in this area.⁷

* * *

³ See Comments of American Cable Association on NPRM, PS Docket No. 18-261 et al. at 2-3 (filed Dec. 10, 2018).

⁴ See Repack Airwaves Yielding Better Access for Users of Modern Services Act of 2018 (“RAY BAUM’S Act”), Pub. L. No. 115-141, 132 Stat. 348, 1095, § 506(c)(2) (2018) (codified at 47 U.S.C. § 615 note) (“The term ‘dispatchable location’ means the street address of the calling party, and additional information such as room number, floor number, or similar information necessary to adequately identify the location of the calling party.”).

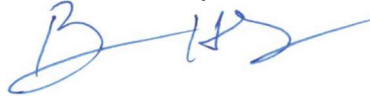
⁵ See NPRM at 9050 (Proposed Rule § 9.16(b)(3)).

⁶ See Reply Comments of American Cable Association on NPRM, PS Docket No. 18-261 et al. at 4-5 (filed Feb. 8, 2019) (“Reply Comments”). Under ACA Connects’ interpretation of the proposed rule, a provider that follows these practices in installing, operating, or managing an MLTS should be deemed to have met its obligation under the rule to “configure” the MLTS to provide dispatchable location, notwithstanding any failure of the customer to supply accurate location information or to keep the information current.

⁷ See Reply Comments at 5.

I have filed this letter electronically pursuant to section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in blue ink, appearing to read 'B Hurley', with a long horizontal stroke extending to the right.

Brian Hurley

cc: David Furth
Erika Olsen
Kenneth Carlberg
John Evanoff
Rasoul Safavian
Thomas Eng
Nellie Foosaner