

May 23, 2019

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: **Ex Parte Presentation, 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 Systems*, PS Docket No. 17-239

Dear Ms. Dortch:

On May 21, 2019, Mary Brown and Daniel Kelly of Cisco Systems, Inc. (Cisco) and the undersigned met with the following staff of the Public Safety and Homeland Security Bureau: David Furth, Kenneth Carlberg, Thomas Eng, John Evanoff, Dr. Rasoul Safavian, Michael Wilhelm, William Beckwith (by phone), Brenda Boykin (by phone), Nellie Foosaner (by phone) and Erika Olsen (by phone). Cisco addressed several issues raised by the Commission's Notice of Proposed Rulemaking in this proceeding. Its presentation was consistent with its comments and reply comments on the proposed rules governing multi-line telephone systems (MLTS).¹

Cisco's representatives first discussed the Commission's proposed definition of "pre-configured" in Draft Rule 9.3. They noted that while Kari's Law Act contains this term, it is not defined in the statute. They explained that the MLTS software Cisco produces and markets to enterprises is capable of being configured at time of installation with a default direct 911 dial setting, but cannot be pre-configured as that term would be defined in the Draft Rule. They urged that the definition be modified to provide that MLTS cannot be marketed without the capability for a default direct dial 911 setting. They further noted that Microsoft had raised the same concern in its comments and proposed a different definition of pre-configured, that its definition would also address Cisco's concern, and that no commenter had opposed either definition.

Cisco's representatives next addressed Draft Rule 9.16(a)(2), which would require that MLTS cannot be marketed unless it is "pre-configured" with dispatchable location. They noted

¹ Comments of Cisco Systems, Inc., PS Docket Nos. 18-261 and 17-239 (filed Dec. 10, 2018); Reply Comments of Cisco Systems, Inc. (filed Feb. 8, 2019).

that Section 506 of RAY BAUM's Act, which the Draft Rule seeks to implement, does not contain a pre-configured requirement, and that configuring MLTS to provide dispatchable location cannot be done until it is installed. They thus recommended that the rule be modified to require that MLTS cannot be marketed without the capability of providing dispatchable location after it is installed.

In response to Staff questions about providing various types of location information, Cisco's representatives noted that MLTS today typically provides the building's street address, and that systems increasingly provide the building floor level. Providing more granular location such as room number is significantly more burdensome and expensive because of the vast amount of data that must be generated and continuously tested so that accurate location information can be transmitted to PSAPs with an emergency call. Cisco's representatives also noted that calls from off-premises locations cannot feasibly provide dispatchable location, and that such locations also may not be under the control of the enterprise operating the MLTS.

Finally, Cisco's representatives referenced the company's comments urging that the rules implementing RAY BAUM's Act not take effect earlier than two years after adoption. They noted that this statute (unlike Kari's Law Act) does not contain a compliance deadline, and that the proposed deadline of February 16, 2020 as set forth in Draft Rule 9.15(c) would be infeasible for many of Cisco's customers, because they need substantial time after the Commission adopts final rules to plan and budget for replacement of MLTS that will fully comply with those rules.

In response to questions from Bureau staff, Cisco's representatives discussed the installation of WiFi access points in enterprise locations, and referenced a joint declaration Cisco had filed with Aruba and Ruckus Networks in a separate proceeding, which addressed the deployment of Wi-Fi enterprise networks, radiofrequency design and utilization, and in-building antenna types and placements designed to prevent interference to devices operating outdoors.²

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's Rules. If you need additional information, please contact the undersigned.

Sincerely,



John T. Scott, III

² Unlicensed Use of the 6 GHz Band, ET Docket No. 18-205 and GN Docket No. 17-183, Comments of Apple Inc. et al (filed Feb. 15, 2019), Appendix D - Characteristics of Enterprise Deployments Using IEEE 802.11 Equipment, [https://ecfsapi.fcc.gov/file/10216633127609/6%20GHz%20RLAN%20Group%20Comments%20\(Feb%2015%202019\).pdf](https://ecfsapi.fcc.gov/file/10216633127609/6%20GHz%20RLAN%20Group%20Comments%20(Feb%2015%202019).pdf)

cc: David Furth
Kenneth Carlberg
Thomas Eng
John Evanoff
Dr. Rasoul Safavian
Michael Wilhelm
William Beckwith
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