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VIA ECFS

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

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

Dear Ms. Dortch:

On May 22, 2019, Paula Boyd from Microsoft, Brendan Kasper from 8X8, John Murphy from Nextiva, Traci Biswese from RingCentral (by phone) and the undersigned, on behalf of the Voice on the Net Coalition (VON), met with David Furth, Erika Olsen (by phone), Michael Wilhelm, John Evanoff (by phone), Dr. Rasoul Safavian, Brenda Boykin (by phone), Nellie Foosaner, William Beckwith, and Thomas Eng, all from the Public Safety and Homeland Security Bureau; and separately Ms. Boyd, Mr. Kasper, Mr. Murphy and the undersigned met with Randy Clarke, legal advisor to Commissioner Geoffrey Starks. During these meetings, VON discussed its comments filed in the above-referenced dockets and made the following points:

- a) The Commission need not require dispatchable location from providers of fixed, interconnected VoIP, as in most cases that information is already collected and provided.
- b) There are technical limitations on the ability of providers of nomadic, interconnected VoIP to provide dispatchable location because of the complexities around capturing accurate location information.
- c) The FCC should not enact 911 obligations on one-way, outbound only VoIP services because it would impose costs on what is typically a free service and there is no evidence that users of these service expect they can be used for 911 calls.

d) The Commission should adopt the definition of Multiline Telephone Systems in the legislation; not the more expansive definition proposed in the Notice of Proposed Rulemaking.

e) The Commission should adopt exemptions from proposed notification requirements for small businesses and business with distributed workforces.

f) Should the Commission impose new 911 obligations on VoIP providers, it must provide at least two years from the effective date of the order for the new requirements to be implemented and the Commission should make clear that limitations on liability would be available to those service providers, similar to other voice service providers.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

By: /s/
Glenn S. Richards
Counsel for VON

CC (*via email*):

David Furth, Deputy Bureau Chief, Public Safety and Homeland Security Bureau (PSHSB)

Erika Olsen, Senior Legal Counsel, PSHSB (by phone)

Michael Wilhelm, Chief, Policy and Licensing Division (PLD), PSHSB

John Evanoff, Deputy Chief, PLD (by phone)

Dr. Rasoul Safavian, Technologist, PLD

Brenda Boykin, Attorney-Advisor, PLD (by phone)

Nellie Foosaner, Attorney-Advisor, PLD

William Beckwith, Attorney-Advisor, PLD

Thomas Eng, Electronics Engineer, PLD