



July 24, 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 July 22, 2019, Mary Brown, Senior Director Government Affairs for Cisco Systems, Inc. ("Cisco") and John Scott of Wilkinson Barker Knauer LLP held separate meetings with Erin McGrath, Legal Advisor to Commissioner Michael O'Rielly; Travis Litman, Chief of Staff and Senior Legal Advisor to Commissioner Jessica Rosenworcel; and William Davenport, Chief of Staff and Senior Legal Advisor, and Randy Clarke, Acting Legal Advisor to Commissioner Geoffrey Starks. The purpose of each meeting was to discuss the draft Report and Order ("draft R&O") circulated on July 11, 2019 in the above-referenced proceedings, FCC-CIRC1908-05, as it applies to Multi-Line Telephone Systems (MLTS).

Cisco's representatives stated that the company fully supports the draft R&O's actions to implement Kari's Law Act of 2017, Pub. L. No. 115-127, and the applicable provisions of RAY BAUM'S Act, Pub. L. No. 115-141, as consistent with these statutes and the rulemaking record. They noted that the draft R&O adopts compliance deadlines for MLTS to provide the 911 caller's dispatchable location that properly account for the time needed for MLTS installers and operators to procure, install and test MLTS for different types of devices. They also noted that the draft R&O adopts reasonable and appropriate definitions of key terms in the statutes including "pre-configured," "notification," and "dispatchable location."

In the event the Commission adopts the draft Order, Cisco's representatives said that the Company will work to inform enterprise customers about the new rules. They urged that the Commissioners also publicize the new requirements when appropriate in their outreach to business organizations. While nearly all such organizations have members which operate facilities where MLTS is deployed, their members do not typically track Commission actions. Commission outreach will thus help advance the objectives of Kari's Law Act and RAY BAUM'S Act to improve the nation's 911 calling systems.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's Rules. If Cisco can provide any additional information, please let me know.

Sincerely,

CISCO SYSTEMS, INC.

By:

Mary L. Brown

Senior Director

Government Affairs

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cc: Erin McGrath
Travis Litman
William Davenport
Randy Clarke