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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 July 24, 2019, I met by telephone with John Evanoff, Rasoul Safavian, Thomas Eng and William Beckwith of the Public Safety and Homeland Security Bureau, and, on July 25, 2019, I met by telephone with Zenji Nakazawa, Public Safety and Consumer Protection Advisor to Chairman Ajit Pai, to discuss the public draft Report and Order in the above-captioned proceeding.¹

As I explained during both calls, ACA Connects supports the Commission’s adoption of rules to implement Kari’s Law and RAY BAUM’s Act. In this proceeding, the Commission is taking important steps to improve 911 service for users of multi-line telephone systems (“MLTS”) and other services.

The Public Draft requires that fixed MLTS be configured to provide dispatchable location information “automatically” when a user places a 911 call. ACA Connects has expressed support for such a requirement,² but it believes that the Order could be improved with the addition of a footnote that clarifies, as follows, the intended meaning of the term “automatically” in para. 149.

¹ See *Implementing Kari’s Law and Section 506 of RAY BAUM’s Act* et al., PS Docket No. 18-261 et al., Public Draft Report and Order, FCC-CIRC1908-05 (rel. July 11, 2019) (“Public Draft”).

² See Reply Comments of the American Cable Association, PS Docket No. 18-261 et al., at 4-5 (filed Feb. 8, 2019).

“In other words, the dispatchable location information associated with a fixed MLTS device must be conveyed to the PSAP when a user places a 911 call, without further intervention by the user at the time it places the call. As noted below, an MLTS operator or manager may rely on an enterprise customer to acquire, maintain, and keep up-to-date the location information associated with a fixed MLTS device. *See infra* para. 164.”

The addition of this footnote would further clarify that, in the context of fixed MLTS, dispatchable location information can be determined by gathering information from the enterprise customer about the location of each device and ensuring that the most recent information is conveyed to the PSAP when a user places a 911 call.

* * *

This letter is being filed electronically pursuant to Section 1.1206 of the Commission’s rules.³

Sincerely,



Brian Hurley

cc: Zenji Nakazawa
John Evanoff
Rasoul Safavian
Thomas Eng
William Beckwith

³ 47 C.F.R. § 1.1206.