The State of Florida Department of Management Services, Division of Telecommunications, Bureau of Public Safety (“the Bureau”), submits these comments in response to the Commission’s Request for Comments (PS-18-261 and PS-17-239) implementation of Kari’s law and section 506 of the Ray Baum’s act.

Overall, the Bureau strongly supports the direction the FCC is moving to that will improve the response time for first responders as they respond to citizens in their time of need.

Section 28, FCC NPRM outlines the proposed definition of a MLTS. The Bureau supports the proposed definition of an MLTS.

In regard to section 39-40, compliance and transitional issues, while the implementation date of February 16, 2020 would apply to all new installations, the Bureau is concerned that some older systems, still in service, would not be upgraded to address this critical area of 911 response. We recommend that specific language and deadline be included to address systems already in service.

In regards to section 42, Enforcement, on the issue of enforcement, the Bureau would recommend a tiered approach to the enforcement of violations of Kari’s law. First time offenders should receive a warning with a strict but reasonable time frame to correct any deficiencies and with an appropriate penalty if the violation is not corrected.

In regards to section 56, the Bureau fully supports requiring MLTS to be configured to provide dispatchable location to PSAPs. The lack of precise information on the location of someone dialing 9-1-1, can cause critical delay in providing help to that person in their time of need.

Comments respectfully submitted by Leon Simmonds, Statewide 911 Coordinator, Bureau of Public Safety, Florida Department of Management Services