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***Ex parte***  
**VIA ECFS**

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

RE: MLTS issues discussed that are part of the following “permit-but-disclose” proceedings:

CC Docket 94-102  
WC Docket 05-196  
PS Docket 07-114  
PS Docket 10-255

Dear Ms. Dortch:

On Thursday January 21<sup>st</sup> at the FCC Headquarters at 445 12<sup>th</sup> Street Southwest, myself, along with my Avaya colleague, Daniel Wilson, ENP were invited to meet with the following individuals to discuss current and future trends in Multi Line Telephone Systems (MLTS) as it pertains to emergency calling and 9-1-1 rules and best practices:

David Furth, Public Safety and Homeland Security Deputy Bureau Chief  
Tim May, 911 Project Leader, Policy and Licensing Division  
Michael Connelly, Attorney Advisor  
Austin Randazzo, Attorney Advisor  
Dana Zelman, Attorney Advisor (via teleconference)

We briefly discussed the tragic incident that occurred on December 1, 2013 in a hotel in Marshall, Texas that has gained national attention when the nine-year-old daughter of Kari Hunt tried to dial 9-1-1 from their hotel room phone while brutal murder of her mother was taking place. Not understanding that a trunk access code of “9” was required, the calls never completed.<sup>1</sup>

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<sup>1</sup> <http://bigstory.ap.org/article/dial-9-911-hotel-death-prompts-petition>

Both Mr. Wilson and I reinforced the fact that when MLTS PBX administrators are conscious of the problem, and when guided by industry best practices and established standards, many implement these basic assistive functions providing superior situational awareness to emergent events that occur in their facilities. We also highlighted the unfortunate lack of standards and statutory mandates, leaving perceptible gaps in compliance.

The pending 9-1-1 National Emergency Address Database was also discussed and it's applicability and potential usefulness to MLTS users. We explained the Avaya implementation model of the Additional Location Data Repository, which predates the concept of the NEAD, and the direct alignment and synergy of the two technologies, and compliance with the NENA i3 Framework for Next Generation 9-1-1 Networks<sup>2</sup>.

Due to the lack of legislation across the US, and the vast inconsistency of language that does exist, we are asked, several times a week, "What is the law?" and "How does it apply to me?". This lack of knowledge on E9-1-1 best practices comes from many individuals, with varying levels of MLTS responsibility, including system administrators, installers, and salespeople. The fact of the matter is that only slightly more than half (24 to be exact) States currently have any E-911 legislation enacted or pending that requires an organization to implement E9-1-1 for the safety of their employees, students, and visitors.<sup>3</sup> Even where the regulation does exist, the breadth varies greatly, with inconsistent requirements. This proves to be extremely complex and difficult to manage in a cost effective manner for institutions that maintain facilities across state lines.

A discussion was held on the level of location granularity that was delivered to the 9-1-1 call taker, and the added complexity and expense that was typically incurred in generating this information. Mr. Wilson and I both highlighted the simplicity and expediency that On Site Notification can bring to local on-site responders.

Legacy solutions that were developed over a decade ago were complex and matched user locations with telephone numbers, as they existed in the ALI database. In most modern commercial MLTS systems, telephone numbers no longer correlate to locations, and specifically, hotel units rarely provide individual telephone numbers for rooms; therefore the legacy management solutions are of little value in correcting the problem within smaller facilities like hotels where the endpoints are in fixed locations. Device mobility is not a primary concern in these environments and the inherent emergency call feature often provides a sufficient level of functionality at minimal incremental costs, if any. For these reasons, dispatch-able address resolution and On Site Notification are the best remedies to deploy to ensure the proper response.

As proof points of the ease and ability to activate this functionality in most modern systems, several hotels have taken action themselves, and have made service request calls to their vendors which have fixed the issues<sup>4</sup>.

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<sup>2</sup> [http://www.nena.org/?NG911\\_Project](http://www.nena.org/?NG911_Project), last accessed January 24, 2016

<sup>3</sup> <http://911etc.com/legislation>, last accessed January 24, 2016

<sup>4</sup> <http://www.kltv.com/story/24359759/karis-petition-hotels-upgrading-911-software-following-marshall-murder>

Avaya recommended the following basic functionality is published in a best practices guide, and established as a minimum requirement nationally.

### **Access to 9-1-1 from any device**

NENA promotes 9-1-1 as "one number, any device, anywhere". Ty Wooten, NENA's Education Director states "The brand knowledge of 9-1-1 is one of the highest in the world. When you put anything or do anything that requires someone to do something other than dialing 9-1-1, it lends itself to potential problems."<sup>5</sup>

### **Localized Alerting**

Providing discrete information about the 9-1-1 event to local personnel is a key to increasing localized situational awareness of an emergent condition. Local staff is aware that a problem exists, and can assist as a Good Samaritan responder, while public safety resources are in route to a location.

### **Direct connections to the appropriate PSAP / Emergency Services network**

MLTS administrators often not realize is that the alarming practice of intercepting emergency calls by local staff will likely connect a caller in the hands of an untrained employee. 9-1-1 centers are staffed by certified Emergency Medical Dispatchers (EMD's) who are specifically trained to handle emergent situations.

Given the vacuum of legislation mandating proper guidelines, MLTS operators will make their own decisions without the proper guidance. Case in point is an incident that took place in Delaware, Ohio in September of 2013. In this case Delaware Police Chief Bruce Pijanowski reported that workers at ICS Telecom of Ohio have been answering 9-1-1 calls, taking down the callers names and locations, and then calling in the information to police themselves, potentially blocking callers from life safety services.<sup>6</sup>

Respectfully submitted,

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Avaya, Inc.

/s/Daniel Wilson, ENP  
Public Safety Subject Matter Expert  
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<sup>5</sup> <http://www.npr.org/templates/story/story.php?storyId=261253901>

<sup>6</sup> <http://www.avaya.com/blogs/archives/2013/10/police-claim-unlawful-e911-call-interception.html>