

NENA

The 9-1-1 Association

1700 Diagonal Road | Suite 500 | Alexandria, VA 22314

Ms. Marlene H. Dortch, *Secretary*
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

January 23, 2014

Re: Multi-Line Telephone System Capabilities in Hotel Environments
Related Dockets: CC 94-102; WC 05-196; PS 07-114; PS 10-255

Dear Ms. Dortch:

On January 22nd, 2014, the undersigned, Trey Forgety, Director of Government Affairs and Regulatory Counsel, along with NENA CEO Dr. Brian Fontes made an *ex parte* presentation to Commissioner Ajit Pai concerning the above-captioned proceedings. Also present were Commissioner Pai's Legal Advisor, Wireline, Nicholas Degani and Acting Legal Advisor, Wireless, Jeffrey Neumann.

During our presentation, we described NENA's history of advocacy on behalf of hotel guests, college dormitory residents, factory and office workers, and other members of the general public who are needlessly exposed to great risks on a daily basis by the absence of clear rules for the provisioning of effective 9-1-1 service in Multi-Line Telephone Systems. Specifically, we explained the four key elements of effective MLTS 9-1-1 service, and how a lack of requirements for MLTS support of those elements allows unsafe products to continue on sale and in use. Those elements are: direct access to 9-1-1 (i.e., without a prefix dialing requirement), accurate location provisioning (e.g., to the room or floor level), on-site notification (to alert guard shack or front desk staff that 9-1-1 has been called), and a prohibition against local termination of 9-1-1 calls to answering points that are not staffed 24x7 with trained public safety telecommunicators. Finally, we explained that NENA has been in touch with representatives of the lodging industry in the wake of the recent tragedy in Texas, and that we have offered to help ensure that current and future systems deployed by that industry are deployed in a responsible and sound manner.

Should you have any questions concerning this presentation, please contact me as below.

Sincerely,



Telford E. Forgety, III, "Trey"
*Director of Government Affairs
& Regulatory Counsel*

CC: Commissioner Ajit Pai
Mr. Nicholas Degani, Office of Commissioner Pai
Mr. Jeffrey Neumann, Office of Commissioner Pai