RAY BAUM'S Act: 911 Dispatchable Location Requirements Explained

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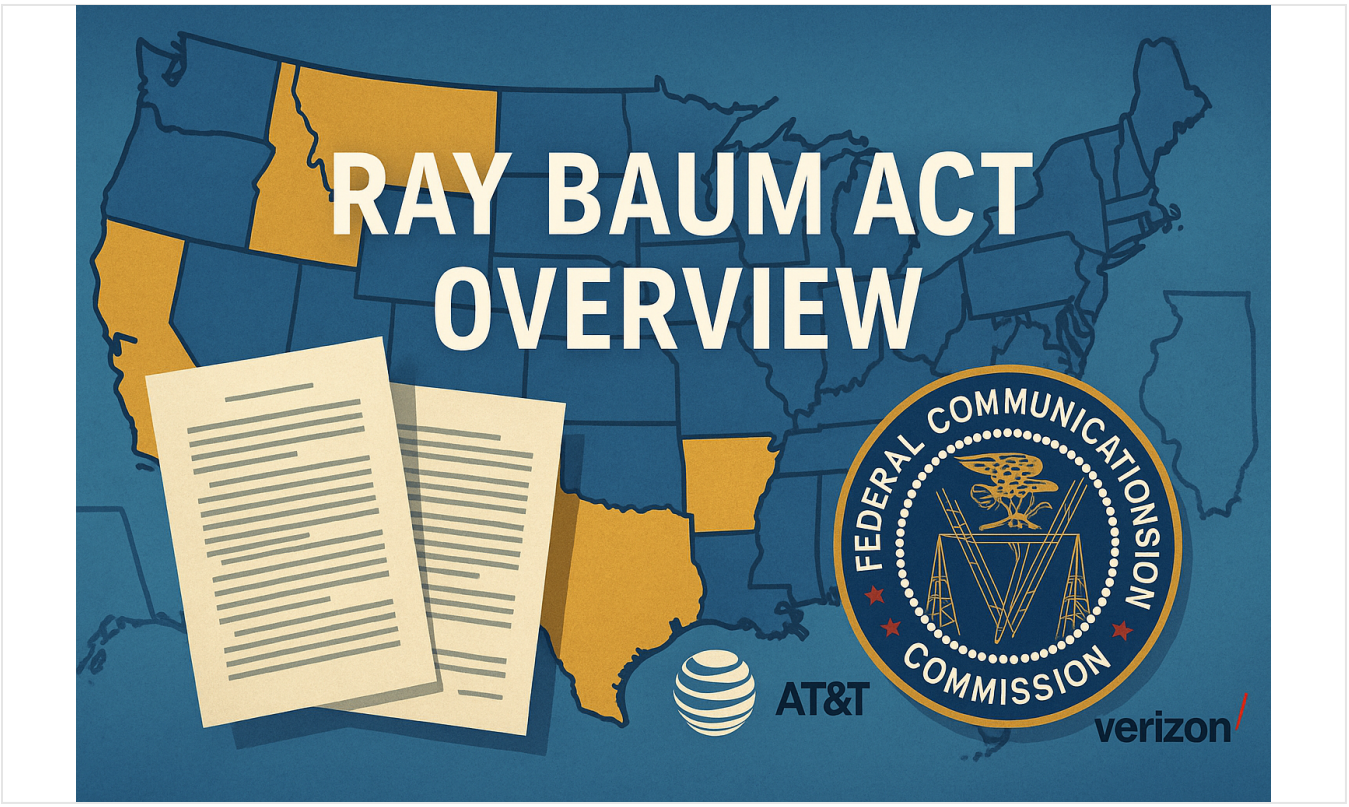

RAY BAUM’S Act: 911 Dispatchable Location Requirements – History, Implementation, and 2025 Overview

Legislative History and Background of the RAY BAUM'S Act

Enactment and Naming: The RAY BAUM'S Act was signed into law in March 2018 as part of the Consolidated Appropriations Act, 2018 govinfo.govgovinfo.gov. It is named in honor of Ray Baum – a former Oregon legislator and House Energy & Commerce Committee staff director who passed away in 2018 – and also serves as an acronym for "Repack Airwaves Yielding Better Access for Users of Modern Services" 911.gov. The Act was introduced in the House (H.R. 4986) by Rep. Marsha Blackburn (R-TN) on February 8, 2018, with the support of Energy & Commerce Committee leadership (notably then-Chairman Greg Walden) congress.gov. The House passed the bill on March 6, 2018, and its provisions (Division P of the omnibus legislation) were ultimately enacted as Public Law 115-141 on March 23, 2018 govinfo.govgovinfo.gov. Congress's intent was to reauthorize the FCC and implement various communications initiatives – including critical 911 emergency calling improvements – as part of a broad legislative package.

Congressional Intent: Section 506 of the RAY BAUM'S Act addresses a key public safety concern: ensuring that 9-1-1 callers can be located quickly and accurately by first responders. This provision was motivated by the growing use of multi-line telephone systems (MLTS), VoIP, and other modern communications technologies in enterprises and homes, which often made it difficult for 911 call centers to pinpoint a caller's exact location inside a large building or campus. By 2018, Congress recognized that while enhanced 911 (E911) had long provided location information for traditional wireline and wireless calls, gaps remained for enterprise phone systems and Internet-based services. The legislative history emphasizes the importance of "sharing precise location information when calling 911" to improve emergency outcomes 911.gov911.gov. In honoring Ray Baum's legacy of public service, lawmakers aimed to strengthen 911 capabilities nationwide and close location accuracy gaps across all voice communication platforms.

Primary Sponsors and Passage: The RAY BAUM'S Act enjoyed bipartisan support. In the House it was championed by Rep. Blackburn (with a committee report by the House Energy & Commerce Committee, H. Rept. 115-587) and in the Senate its provisions were backed by leaders of the Commerce Committee. The Act was ultimately folded into the large budget bill for expediency; President Trump signed it into law as part of the omnibus on March 23, 2018 govinfo.gov. Notably, **Section 506** – the focus of this report – was one of several "Additional Provisions" in Title V of the Act, reflecting Congress's intent to mandate FCC action on 911 location accuracy govinfo.govcongress.gov.

Section 506: Dispatchable Location Requirements for 911 Calls

Statutory Mandate (Section 506): Section 506 of the RAY BAUM'S Act ("Accuracy of dispatchable location for 9–1–1 calls") directed the Federal Communications Commission (FCC) to initiate a proceeding, within 18 months of enactment, to consider adopting rules ensuring that a "**dispatchable location**" is conveyed with every 911 call, regardless of the technology used govinfo.govgovinfo.gov. In the statute, **"dispatchable location"** is defined as "the street address of the calling party, and additional information such as room number, floor number, or similar information necessary to adequately identify the location of the calling party" govinfo.govcongress.gov. In simpler terms, dispatchable location means a civic address *plus* any details needed to find the caller (e.g. building floor, suite, apartment, or room).

Section 506 explicitly includes 911 calls from multi-line telephone systems (MLTS) in its scope govinfo.gov, signaling Congress's concern about enterprise phone systems in offices, campuses, and hotels, where 911 calls might otherwise only transmit a front desk address. The provision required the FCC to **"consider adopting rules"** for dispatchable 911 location – giving the FCC flexibility to build on its existing E911 proceedings, but not obligating re-litigation of decisions already made in prior wireless location accuracy dockets govinfo.gov. The term *"911 call"* in the Act was defined broadly to include not only voice telephone calls but also messages sent by other means to a Public Safety Answering Point (PSAP) for emergency help govinfo.gov. This foreshadowed that the FCC's rules should encompass newer modes of communication (such as text-to-911 and IP-based messaging) in addition to traditional calls.

Legal Analysis of Section 506: By its terms, Section 506 did not amend the Communications Act of 1934 directly; rather, it is a statutory directive (codified at 47 U.S.C. § 615 note intrado.com) compelling FCC regulatory action. The **legislative intent** was to eliminate the location ambiguities that plague emergency response in an era of nomadic and enterprise telephony. Congress wanted 911 callers to be **automatically located** as precisely as possible, whether the call originated from a VoIP softphone, a cloud-based MLTS, a campus phone, or any other modern service 911.govdocs.fcc.gov. This intent aligns with high-profile tragedies and near-misses in which responders were delayed or sent to the wrong address because a 911 call from an office building, hotel, or VoIP line lacked precise location info. Section 506's mandate reflects a policy judgment that the **public safety benefits** of transmitting granular location information (to speed up emergency response) outweigh the regulatory burdens on service providers and device

manufacturers. It effectively extends the ethos of **"E911"** – which historically ensured that wireless and wireline carriers deliver caller location – to **enterprise telephony and Internet-based communications** platforms that had fallen outside many legacy 911 rules.

FCC Implementation and Regulatory Timeline (Section 506 Rules)

FCC Rulemaking (2018–2019): In compliance with Section 506, the FCC moved quickly to implement dispatchable location rules. It opened Public Safety docket PS 18-261 and, on August 1, 2019, the Commission **adopted a Report and Order (FCC 19-76)** implementing Kari's Law and Section 506 of RAY BAUM'S Act intrado.comintrado.com. The FCC's order, released August 2019, added new requirements under 47 C.F.R. Part 9 to **"ensure that 'dispatchable location' information is sent with 911 calls so that 911 personnel and first responders can more quickly locate the caller."** 911.gov In essence, the FCC extended 911 location obligations to a broad array of services as Congress had envisioned.

Services Covered: The FCC's rules **"apply dispatchable location requirements"** to the following 911-capable services, among others docs.fcc.gov:

- **Multi-Line Telephone Systems (MLTS)** – enterprise phone systems used in offices, campuses, hotels, etc. docs.fcc.gov.
- **Fixed Telephone Service (Traditional landline)** – including legacy wireline phones, which generally already provide a registered street address via E911 databases docs.fcc.gov.
- **Interconnected Voice over Internet Protocol (VoIP)** services – VoIP telephone services that can call PSTN numbers, whether fixed or nomadic docs.fcc.gov.
- **Internet-based Telecommunications Relay Services (TRS)** – services like Video Relay Service (VRS) and IP Relay used by individuals with hearing/speech disabilities to call 911 docs.fcc.gov.
- **Mobile Text Messaging Services** – text-to-911 communications originating from commercial mobile providers' SMS (the FCC set parallel requirements for texting) federalregister.govdocs.fcc.gov.

Notably, **mobile cellular 911 calls** were *not* the primary focus of the new rules, since wireless carriers were already subject to their own rigorous E911 location accuracy mandates (including handset GPS and network location requirements). The FCC explicitly stated that the new dispatchable location rules "do not apply to wireless providers," as those were covered under separate existing standards docs.fcc.gov. In other words, the 2019 rules filled the gaps for **all other 911-capable platforms** so that, going forward, virtually any device or service dialing 911 must provide either a dispatchable location or a comparable location method.

Compliance Benchmarks and Deadlines: The FCC set phased implementation deadlines to give industry time to comply intrado.com. Key benchmarks included:

- **January 6, 2021:** Dispatchable location required for **911 calls from "fixed" devices** intrado.com. This one-year deadline (from the rules' effective date) applied to fixed services such as *fixed MLTS phones* and fixed interconnected VoIP lines. By this date, any 911 call placed from a fixed device must include automated dispatchable location information delivered to the PSAP intrado.com. For example, a VoIP desk phone or MLTS station with a static office location must transmit its specific street address and location within the building. *Compliance Note:* The rules grandfathered existing systems – the obligations apply to MLTS installed or manufactured **after February 16, 2020** intrado.com (the two-year anniversary of Kari's Law enactment), so legacy phone systems in service before that date were exempt until upgraded intrado.com.

- **January 6, 2022:** Dispatchable location required for **911 calls from "non-fixed" devices** intrado.com. Within two years, providers had to support location for nomadic or mobile devices associated with these services. This includes *on-premises non-fixed MLTS devices* (e.g. a wireless VoIP handset or a softphone laptop used on a company's campus Wi-Fi) and *off-premises devices* (e.g. a remote VoIP user or a softphone used outside the office) 911.gov. The FCC recognized that for non-fixed and mobile contexts, an **automatic dispatchable location** may not always be technically feasible. Therefore, by January 2022, if a fully automated dispatchable solution is not available, the rules allow alternatives: (1) **Manual (user-provided) location updates** or (2) **"enhanced location information"** such as coordinate-based location, using the best available technology, to approximate the caller's location federalregister.gov. In short, by 2022 a covered provider must either supply a dispatchable civic address *or* at least some actionable location (GPS coordinates or similar) for 911 calls from nomadic devices federalregister.gov. This tiered requirement ensures that even a roaming VoIP softphone will send *something* to help locate the caller, even if it's not a full street address.

- **Text-to-911 by 2022:** The FCC's August 2019 order also extended dispatchable location to text messages to 911. It required that by **January 6, 2022**, mobile text providers send automated location with texts to 911 if technically feasible; otherwise, either prompt the user for location or provide coordinate-based location federalregister.gov. This aligned the text-to-911 timeline with the two-year window for nomadic voice services.

These FCC deadlines have now passed. As of 2025, all covered service providers are expected to be compliant with the dispatchable location rules. The FCC's Public Safety Bureau has been actively monitoring compliance since 2021, and the Commission has authority under the Communications Act's enforcement provisions (Title V) to issue forfeitures (fines) for violations congress.govcongress.gov. In fact, FCC enforcement of these 911 requirements has been ramping up: by 2024 the FCC issued high-profile fines (e.g. a $100,000 forfeiture in one case) against companies that failed to implement MLTS 911 upgrades gomindsight.comgomindsight.com. Noncompliance can incur penalties of up to **$10,000 per violation per day** under 47 U.S.C. § 503 and related provisions, so there are significant financial and legal risks for entities that ignore the mandates.

Summary of FCC Rules (47 C.F.R.): To implement Kari's Law and RAY BAUM'S Act, the FCC consolidated its 911 rules into a single part of the Code of Federal Regulations. Today, **47 C.F.R. Part 9** (termed "911 Requirements") contains the rules for all services. Subpart *F* of Part 9 covers MLTS-specific obligations (direct dialing and dispatchable location) 911.govintrado.com, while other subparts address VoIP, wireless, etc. The FCC's August 2019 order updated the definition of **"Dispatchable location" in 47 C.F.R. §9.3** to mirror the Act's language – i.e. a validated street address plus additional details (suite, floor, etc.) sufficient to identify the caller's location ecfr.gov. Key rule sections include:

- **47 C.F.R. § 9.16** – which codifies Kari's Law requirements for MLTS (direct 911 access and notification) and dispatchable location obligations for MLTS operators intrado.comintrado.com.
- **47 C.F.R. § 9.10** – which contains 911 obligations for other services; for example, §9.10(q) was amended to add dispatchable location for text-to-911 federalregister.gov. Interconnected VoIP providers are required to transmit 911 calls with the caller's "Registered Location" and/or dispatchable location, and to provide end-users a method to update their location (this falls under §9.11 and §9.20 in the restructured Part 9).
- **47 C.F.R. § 9.3 (definitions)** – updated to include *Dispatchable Location* definition consistent with the statute ecfr.gov and clarify "On-premises" vs. "Off-premises" MLTS device, etc.

The FCC's implementing Report & Order (FCC 19-76) and the subsequent **Federal Register publication (84 FR 66716)** provide detailed discussion of these rule changes docs.fcc.govdocs.fcc.gov. In summary, by early 2022 the United States had in place a comprehensive regulatory framework compelling virtually all voice communications platforms to support **dispatchable 911 location**, fulfilling the mandate of RAY BAUM'S Act Section 506 docs.fcc.gov.

Impact on VoIP, MLTS, and Other Communication Providers

Section 506 and the FCC's rules have had wide-reaching implications for service providers and enterprises. **Any provider or operator of a 911-capable service now bears responsibility for delivering location information with emergency calls.** Below is an analysis by sector:

- **Impact on Multi-Line Telephone Systems (MLTS) – Enterprise Telephony:** MLTS operators (businesses, organizations, government agencies with enterprise phone systems) arguably face the most significant operational changes. Under the combined Kari's Law and RAY BAUM'S Act rules, an MLTS must: (1) allow direct 911 dialing without any prefix, (2) provide notification (e.g. to a front desk or security office) upon a 911 call, and (3) ensure a dispatchable location is delivered with the 911 call intrado.comintrado.com. For fixed MLTS phones (e.g. a desktop phone in an office), the system must automatically send the precise street address *and* specific location (building, floor, room) to the PSAP for every 911 call intrado.com. This typically requires programming each station's location information into the system's Automatic Location Identification (ALI) records or using a Location Information Server (LIS) that can map each phone's extension or network port to a civic address and sub-location.

  For nomadic or wireless MLTS devices (like Wi-Fi phones, DECT cordless phones, or softphone software on laptops), the enterprise must use **technological solutions to track the device's location** within the facility, or else implement procedures for manual location updates. The FCC intentionally allowed flexibility: if automated location is **"not technically feasible,"** the MLTS operator can satisfy the rule by providing "alternative location information" – e.g. coordinate-based location or a user-provided location – that is sufficient to identify the caller's approximate area federalregister.gov. In practice, many enterprises have turned to enhanced 911 services and vendors to comply. Solutions include Wi-Fi access point mapping (to derive a device's location from the nearest Wi-Fi hotspot), network switch port tracing for Ethernet phones, or requiring remote softphone users to confirm their current address before connecting calls. The net impact is that MLTS administrators must maintain **up-to-date location databases** for their

phone systems. Whenever an employee's phone is moved to a new office or a new branch location comes online, the MLTS database (and the 911 ALI records) must be updated to reflect the new dispatchable location.

In operational terms, enterprises needed to **upgrade PBX software** and interfaces to support sending the proper address info with 911 calls. Modern cloud-based and IP-PBX vendors have implemented dynamic location functionality to assist customers. For example, some systems use the network topology (subnet, Wi-Fi SSID, or Bluetooth beacons) to auto-locate softphones within a building, while others prompt the user to input their location upon login. The FCC's rules also spurred coordination between MLTS operators and local 911 authorities to validate and provision location data. Many businesses that never before interacted with 911 database administrators have had to establish processes to provide their floor plans or location keys to the local 911 addressing authority (often via a vendor like Intrado or Comtech that manages national 911 databases). In short, **MLTS providers must treat 911 as a critical service feature** – ensuring connectivity and accurate location – whereas previously some enterprises might have treated 911 in a more ad-hoc way. The 2021–2022 compliance period saw enterprises large and small conducting audits of their phone systems to identify any extensions lacking proper location data.

- **Impact on Interconnected VoIP Providers:** Interconnected VoIP service providers (e.g. residential VoIP services, hosted PBX providers, and UCaaS/cloud communications companies) were already subject to FCC E911 rules since 2005. Prior rules required VoIP providers to obtain a "Registered Location" from customers and transmit that address and call-back number (ANI) to the appropriate PSAP for 911 calls ecfr.gov. However, RAY BAUM'S Act and the new FCC rules significantly strengthen these obligations. VoIP providers must now provide a **"dispatchable" location with 911**, which means going beyond a simple billing address. For fixed VoIP (where the device is used at a static location), the provider must ensure the 911 call is delivered with the customer's street address plus any apartment, suite, or floor info – effectively the same as a traditional landline's entry in the Master Street Address Guide. For nomadic VoIP services (where a user can use the app or device anywhere), by January 2022 providers had to implement ways to acquire and transmit the caller's current location automatically if possible disa.mil. If automatic location is not feasible, providers must at least give users an easy and accessible method to update their registered location whenever they relocate federalregister.gov. Many VoIP providers updated their software to prompt users for location whenever the service is used from a new Wi-Fi or IP network. Some services have leveraged device GPS or third-party location services to attempt to auto-detect location (with user permission) for 911 purposes.

A key impact on VoIP providers is the need to **integrate with nationwide 911 databases and location infrastructure.** Providers often contract with specialized 911 routing services (such as Intrado, Bandwidth, etc.) that can take a 911 call from the VoIP platform, match the caller's number or IP to a location record, and route the call to the correct PSAP with the location data. Under the new rules, VoIP providers had to enhance these arrangements to support more granular location. For instance, a cloud PBX provider serving a multi-site business might now store multiple dispatchable locations for a single account (one for each office site or even each floor of a building) and dynamically choose the correct one based on where the user's device is registered. The regulatory change has thus driven **innovation in location-management tools** for VoIP. It also required VoIP providers to educate their customers: businesses and residential users must understand the importance of keeping location information up to date. The FCC continued to require clear customer disclosure if there are limitations in VoIP 911 service, but ideally, the goal is that the service should automatically handle location so the caller doesn't have to think about it in an emergency.

- **Impact on TRS (Telecommunications Relay) Services:** Internet-based TRS providers (which enable text or video calls for people with hearing or speech disabilities) have similarly been brought under dispatchable location requirements. For example, a Video Relay Service provider (where a user signs to a video interpreter who then calls 911 voice on their behalf) must ensure the 911 center receives the caller's address information. Prior to RAY BAUM'S Act, TRS providers already required their users to register a default location for 911, but the new rules push for parity with voice services – meaning if a VRS user moves locations, the TRS provider is expected to obtain a dispatchable location for that call and relay it to the PSAP disa.mildisa.mil. The operational impact on TRS providers includes upgrading their databases and call handling systems to insert the correct location info into the 911 call flow. They must also coordinate with the national emergency services network in the same way VoIP providers do, to route calls based on location. This ensures that a 911 call initiated through a relay service is delivered to the *nearest* PSAP with appropriate location, rather than, say, always going to a default PSAP near the user's home address. By 2025, TRS providers have implemented these changes so that dispatchers receiving a relay call see a valid address/location on their screen, improving response times for those callers.

- **Impact on Text-to-911:** As texting to 911 becomes more widely available, the FCC's implementation of Section 506 now obligates covered text providers to supply location with emergency texts. This applies primarily to commercial mobile carriers offering SMS-to-911. By the January 2022 deadline, if you send an SMS to 911, the carrier must provide **automated dispatchable location if technically feasible**; if not, they must provide either a way for the texter to input their address or provide an approximate location (e.g. using the cell tower or

handset location) federalregister.gov. In practice, many carriers have chosen to send approximate GPS-based coordinates with texts, since true dispatchable (civic address) for a texting device may not be feasible unless the device has GPS or the user enters it. The impact here is mainly on the network and standards side – carriers had to update texting protocols and the backend 911 systems (Text Control Centers) to include location data fields. For PSAPs that accept texts, this means they now often receive an automated location "payload" along with the text message, which can be a coordinate plotted on their mapping system or an address if available federalregister.govfederalregister.gov. This development brings texting closer to parity with voice 911 calls in terms of location information.

In sum, the Act's implementation has **extended the obligation of delivering a 911 caller's precise location to virtually every corner of the communications industry**. VoIP and MLTS providers, in particular, have had to undertake significant compliance efforts. While consumers and end-users may not see these back-end changes, the benefit is that when they dial 911 – whether from a traditional phone, an office phone, a VoIP app, or even via text – the chances that first responders automatically know exactly where to go are higher than ever before. The FCC noted that these rules are *technology-neutral* and performance-based: providers can choose **any technology or method** that achieves the result of conveying dispatchable location, and they are only excused if it is truly not technically feasible to do better than a coarse location federalregister.gov. This flexibility has encouraged a range of solutions rather than a one-size mandate.

Technological and Operational Requirements Imposed on Service Providers

Implementing dispatchable location for 911 has been as much a technical challenge as a legal one. The RAY BAUM'S Act and FCC rules effectively impose the following **technological and operational requirements** on service providers and system operators:

- **Location Data Management:** Service providers must establish systems to **collect, store, and retrieve precise location data** for their users or endpoints. For MLTS and VoIP, this often means maintaining a database mapping each telephone number or device to a civic address and sub-location (building, floor, room). Operationally, providers need processes for **validating addresses** against Master Street Address Guides (to ensure they are recognized by 911 systems) and for updating this information whenever a user moves. Many providers have built user interfaces (web portals or prompts) that allow end-users or enterprise administrators to

update their 911 location on file. For example, a cloud VoIP provider might require a teleworker to confirm their current address upon logging in from a new IP address, thereby updating the "Registered Location" in real time.

- **Device and Network Capabilities:** Any new multi-line telephone system equipment sold after February 2020 must be **capable of supporting direct 911 dialing and transmitting location info** congress.gov. Manufacturers and vendors of enterprise phone systems had to incorporate compliance features into their products. Technologically, this means MLTS equipment should support industry standards for passing location data along with a 911 call. Standards like **SIP PIDF-LO (Presence Information Data Format – Location Object)** are used in VoIP signaling to convey location. MLTS solutions now typically have the capability to embed a PIDF-LO with the call or to coordinate with an external LIS server. The FCC's rules did not prescribe a specific standard, but the onus is on providers that whatever signaling format is used, the **PSAP receives the location in the Automatic Location Information (ALI) data**. In the operational sense, MLTS operators must ensure their 911 calls actually go out over trunks or gateways that support transmitting ANI/ALI information to the public network. In some cases, enterprises needed to upgrade their trunking service or work with their carrier to enable "Enhanced 911" on their SIP trunk so that the location record is properly retrieved by the 911 network when a call is made.

- **Real-Time Location Updates for Nomadic Devices:** For devices that move, providers are encouraged to leverage real-time location technologies. This includes using **GPS, Wi-Fi positioning, or device sensors** to get a location fix. For instance, some smartphone-based VoIP apps can use the phone's GPS to get coordinates if the user dials 911 through the app, then convert those coordinates to a dispatchable address via a location information server. Another operational approach is network-based location: mapping IP addresses to physical locations in corporate networks, or using the MAC address of the connecting router to identify a known location. The FCC did not mandate a particular technology but did require that if a provider **can** automatically obtain the caller's location via available tech, it must do so federalregister.gov. This pushes providers toward **innovative solutions**, such as integrating their systems with Wi-Fi access point maps, Bluetooth beacon systems, or third-party location determination services. A concrete example is in large university campuses: some have installed networks that can pinpoint which building a VoIP call is coming from by detecting the nearest network switch or access point, then append the building and floor info to the 911 call data.

- **Operational Readiness and Testing:** The new rules implicitly require providers to thoroughly **test their 911 systems and location transmission**. Sending dispatchable location involves coordination between the originating service, the 911 routing network, and the PSAP's systems.

Providers and enterprises have had to conduct test calls to verify that PSAPs indeed receive the correct address and location data. In fact, many state laws (discussed below) mandate testing when systems are installed or reconfigured. From an operations perspective, carriers and MLTS managers needed to update their **standard operating procedures**: for example, when deploying a new MLTS at a site, there must be a step to provision all phone locations into the 911 database, and when an employee desk moves, there must be a helpdesk process to update their 911 info concurrently. Training of IT staff and end-users has been part of this requirement – users should be informed (and periodically reminded) to update their location in any softphone/VoIP application when they change addresses, and IT personnel must be trained on the compliance obligations.

- **Resiliency and Fall-Back Measures:** An operational requirement often discussed alongside dispatchable location is ensuring that 911 calls **successfully route** even if location information is missing or if the IP service fails. The FCC's rules assume providers will have robust 911 routing in place (for example, using nationwide 911 call centers to route VoIP 911 calls based on the registered location). Providers must have agreements in place with 911 routing partners or local exchange carriers to carry 911 traffic with location. Additionally, if a user does not have a dispatchable address on file (perhaps they neglected to update it), providers typically implement a fall-back: some will route the call to a **national emergency call center** where an operator can attempt to verbally obtain the location. While not explicitly mandated in Section 506, having these contingencies is a practical necessity to meet the spirit of the law that every 911 call should convey location (even if by asking the caller).

- **Record-Keeping and Compliance Monitoring:** The FCC requires certification and has sought updates on compliance. Providers need to maintain records that they have met the deadlines (e.g. records of software updates enabling dispatchable location, logs of user location update prompts, etc.). Should the FCC audit a provider or an enterprise 911 system (and indeed, by 2024 the FCC had begun selective audits gomindsight.comgomindsight.com), these records demonstrate compliance. For MLTS manufacturers and vendors, compliance with Kari's Law and RAY BAUM's Act is now a selling point – many include statements of compliance in product documentation, and they may be asked for evidence (such as the capability to send a SIP PIDF-LO with a call).

In summary, the technological and operational requirements of the Act have effectively modernized 911 infrastructure across VoIP and enterprise systems. Service providers had to implement **location determination and delivery mechanisms**, integrate with emergency services networks, and create user-friendly processes to keep location information current. These requirements ensure that from the moment a 911 call is placed, there are systems in motion to immediately provide first responders

with *where* that call is coming from – fulfilling the safety goals of dispatchable location. As the FCC noted, these new rules "facilitate timely emergency response and improved location accuracy across communications platforms" docs.fcc.gov, finally bringing the 911 capabilities of VoIP/MLTS on par with (and in some cases exceeding) those of traditional telephony.

FCC Rules and Relevant FCC/Legal References

The implementation of RAY BAUM'S Act Section 506 has been codified in both federal statutes and FCC regulations:

- **Federal Statutes:** Section 506 itself is part of the RAY BAUM'S Act of 2018, Division P, Title V, §506, of Public Law 115-141. Although not codified as a freestanding section of the U.S. Code, it is noted as a statutory **"47 U.S.C. § 615 note"** (since it relates to 47 U.S.C. 615, the provision concerning 911 service) intrado.com. Meanwhile, Kari's Law (which complements RAY BAUM'S Act on the MLTS 911 dialing side) was enacted as Public Law 115-127 and is codified at **47 U.S.C. § 623** (Communications Act §721) congress.gov. Together, these laws form the federal statutory basis for 911 emergency calling requirements in enterprise/VoIP contexts.

- **FCC Regulations:** The FCC's primary rules implementing Section 506 are found in **47 C.F.R. Part 9** (which was reorganized and reissued in 2020 to consolidate all 911 rules docs.fcc.gov). Key rule sections include:

  - **47 C.F.R. § 9.9** – General 911 obligation (all providers of 911-capable services must transmit 911 calls to PSAPs).

  - **47 C.F.R. § 9.11** – Obligation of interconnected VoIP providers to provide E911 service, including transmitting the caller's Registered Location and callback number ecfr.gov. (In practice, this ties into dispatchable location because the "Registered Location" should now be dispatchable).

  - **47 C.F.R. § 9.16** – Kari's Law and dispatchable location for MLTS. §9.16(b) specifically requires MLTS to provide a dispatchable location with 911 calls, with the phased deadlines discussed above (one year for fixed, two years for non-fixed) intrado.com. It also references the February 16, 2020 applicability date for new systems intrado.com.

  - **47 C.F.R. § 9.10(q)** – Location accuracy for text-to-911: subsection (q)(10)(v) was added to impose the January 6, 2022 dispatchable location or alternative location requirement on covered text providers federalregister.gov.

- **47 C.F.R. § 9.3** – Definitions, including **"Dispatchable location"** (tracked to the statutory definition: *"a location delivered to the PSAP with a 911 call that consists of the validated street address of the calling party, plus additional information such as suite, apartment, or similar information necessary to adequately identify the location of the calling party"* ecfr.gov).

In the FCC's Report and Order (FCC 19-76), the Commission provided extensive discussion and legal justification for these rules docs.fcc.govdocs.fcc.gov. It concluded that its authority under the Communications Act (specifically sections 201, 251(e), and 303(r), among others) allows it to impose such 911 requirements on interstate communications and that Section 506 of RAY BAUM'S Act gave a clear congressional mandate to do so docs.fcc.gov. The FCC's order also amended the definition of "interconnected VoIP" in its rules to ensure that any VoIP service that enables PSTN calling is subject to the 911 requirements (closing potential loopholes) intrado.comintrado.com.

Relevant FCC Rulings and Citations: In implementing the Act, the FCC built on prior rulings:

- The **VoIP E911 Order of 2005** (FCC 05-116) established initial VoIP 911 duties – RAY BAUM'S Act effectively pushed this further to require dispatchable locations.
- **FCC 19-76 (2019)** – *Report and Order on Kari's Law and RAY BAUM'S Act*, cited in the Federal Register at 85 FR 57767 (Oct. 16, 2020) and 85 FR 75894 (Nov. 27, 2020) for various rule parts. This is the principal order creating the rules we have discussed intrado.com. It is often cited alongside Section 506 in legal references intrado.com.
- **FCC Enforcement Advisories** – In 2020 and 2021, the FCC issued public notices reminding operators of the upcoming compliance deadlines and warning of enforcement. For example, FCC Enforcement Advisory DA 20-998 (Sept. 2020) put MLTS manufacturers and operators on notice regarding the February 2020 and January 2021 requirements 911.govintrado.com.
- **State-Federal Coordination:** Not a ruling per se, but it's worth noting the FCC worked with the National 911 Program (911.gov) to publish guidance for different stakeholders on these new laws 911.gov911.gov. These guidance documents (Oct. 2020) provide non-binding but authoritative explanation of the rules and can be cited in compliance literature 911.gov.

At the federal level, there is now a clear chain of authority: **47 U.S.C. §615 notes (RAY BAUM'S Act §506) ⇒ FCC 19-76 R&O ⇒ 47 C.F.R. Part 9 (Subpart C, D, F etc.)**. All providers and enterprises falling under these provisions are legally required to comply, and as noted, violations are subject to FCC enforcement under the Communications Act's forfeiture penalties (which can involve substantial fines per day, per violation).

State-by-State 911 Dispatchable Location Laws (2025 Overview)

In addition to the federal law and FCC rules, many U.S. states have enacted their own **911 regulations for multi-line systems and dispatchable location**, either preceding the federal requirements or to reinforce and complement them. As of 2025, roughly twenty states have specific statutes or administrative codes addressing MLTS 911 capabilities, often referred to as "E911 legislation" for enterprise telephone systems. These state laws vary in scope and stringency, but generally they aim to ensure that when a 911 call is made from a multi-line system in that state, responders receive meaningful location information. Below is an overview of notable state regulations, especially those focused on **dispatchable location standards**:

- **Alaska:** Alaska's law empowers local municipalities to require MLTS operators to provide enhanced 911 service. In effect, certain localities can mandate that businesses configure their phone systems to deliver both a callback number and location to the PSAP intrado.comintrado.com. (This is an enabling statute rather than a statewide mandate.)

- **Arkansas:** Arkansas has a statewide MLTS statute requiring that the system **deliver to the PSAP the telephone number and "street address" of any telephone used to place a 911 call** intrado.com. Additional details and exemptions are outlined in Ark. Code § 12-10-317. Essentially, each 911 call must carry an ANI (Automatic Number Identification) and ALI (Automatic Location Identification) corresponding to the specific phone from which the call is made, not just a main billing address intrado.com.

- **Colorado:** Colorado's approach (historically one of the older laws) focused on user notification. MLTS operators that cannot provide ANI/ALI must **inform end-users in writing** of how to dial 911 (e.g. dialing 9 first) and that they should provide their location verbally to the dispatcher intrado.com. Colorado requires at minimum that instructions for 911 dialing be given, and if the system doesn't send location automatically, users must be warned of that limitation. (Colorado's law was an early measure; since Kari's Law and RAY BAUM'S Act now cover direct dialing and location, Colorado's requirements serve as a supplement to ensure transparency to callers.)

- **Kentucky:** Kentucky's law is quite specific about location detail: any residential MLTS in an E911 capable area must provide ANI and ALI for each call, **including the street address plus any apartment number or floor number** for the caller's location intrado.com. This means if a 911

call comes from a large building or multi-unit residence, the ALI must show the exact unit or floor. Kentucky imposes this on residential private branch exchanges; for businesses, similar granular location information is expected.

- **Louisiana:** Louisiana requires that **PBX (private branch exchange) systems installed after January 1, 2005 be capable of providing station-level ALI** intrado.com. "Station-level" means the telephone extension's specific location rather than just the building's main address. Louisiana's law (La. R.S. 29:726) essentially anticipated the dispatchable location concept by ensuring new PBXs since 2005 have the technical ability to pass the precise location of each station to the PSAP.

- **Maine:** Maine has comprehensive E911 regulations (Chapter 1 of the Maine Public Utilities Commission's 911 rules) for both residential and business MLTS. In Maine, **any entity operating an MLTS must ensure that 911 can be dialed without a prefix and that a distinct ANI and ALI is delivered for each calling station** intrado.com. For residential MLTS (like a campus dorm or apartment complex PBX), each living unit must have its own location identity in the 911 system intrado.com. For businesses, the law requires delivering an ANI/ALI that identifies the specific building and floor or similar sub-address for the caller intrado.com. Maine also includes provisions for hotels/motels and permits private emergency answering points for large campuses (like a university may have its own police dispatch center). Maine's rules effectively embody the dispatchable location principle: one should be able to determine the *exact location* (room or area) from which a 911 call originated, whether it's a hotel room, an office suite, or a factory floor.

- **Maryland:** Maryland implemented **Kari's Law** principles early (H.B. 1080 in 2017) by requiring MLTS to permit direct 911 dialing by the end of 2017 intrado.com. Maryland's law focused on the dialing aspect and did not explicitly add location requirements beyond what was already required under its existing 911 system. (Maryland's 911 statute had long required carriers to provide ANI/ALI; the MLTS law made sure MLTS calls reach the PSAP directly. The state has since largely deferred to the new federal location rules for enforcement, while continuing to enforce direct dialing.)

- **Massachusetts:** Massachusetts has one of the more stringent state regulations, dating back to 2009 (with updates since). **All new or substantially renovated MLTS in Massachusetts must route 911 calls to the appropriate PSAP and provide ANI and ALI for every call** intrado.com. The level of detail required is set by regulation 560 CMR 4.00: the ALI must include building identifier and floor/unit for large buildings. Massachusetts outlines specific exemptions (e.g. for certain small businesses or temporary structures) but, by and large, any modern MLTS in

Massachusetts must be capable of providing a **dispatchable location**. For example, a university installing a new phone system must ensure that each dormitory phone transmits the dorm name and room number on 911 calls intrado.com. Massachusetts was ahead of the federal law; by 2019 it updated its rules to align with Kari's Law as well (e.g. no 9-prefix needed).

- **Michigan:** Michigan overhauled its 911 statute in 2019 with Public Act 30, explicitly to address enterprise 911 location. The **Michigan Emergency 9-1-1 Service Enabling Act** amendments require that any business or organization with a workspace larger than 7,000 square feet must implement **specific location identification for 911 calls by the end of 2020** plantemoran.com. In practical terms, for a building over 7,000 sq. ft., simply providing the building's address is not enough – the MLTS must provide additional info such as floor or quadrant. Michigan's law defines "workspace" as the area where work is performed (excluding mechanical spaces, etc.) plantemoran.com. For each such workspace above the size threshold, a distinct location detail (like "Floor 3, Northwest wing") must be passed on a 911 call. The Michigan law also exempted certain small businesses, farms, and houses of worship from needing the detailed location if they are below the threshold or use fewer lines intrado.com. Michigan set varying deadlines: large organizations were to comply by Dec 31, 2020, with some extensions for existing systems. By 2025, Michigan's requirement is fully in effect, meaning multi-line systems across Michigan's campuses, office towers, and industrial sites are expected to yield **precise in-building locations** to 911 (or else the organization could face state penalties).

- **Minnesota:** Minnesota was an early adopter (statute effective 2005) of MLTS 911 rules. It requires that **any MLTS purchased after Dec 31, 2004, must provide ANI and ALI for each 911 call** intrado.com. For business MLTS, the rule is that the location information should identify the building and floor the call came from (similar to dispatchable location), and for residential MLTS (like apartments) one ANI/ALI per unit is required intrado.com. Hotels and schools have specific sub-requirements in Minnesota's statute (Minn. Stat. §403.15). Essentially, Minnesota made sure new phone systems would be 911-compatible to the station level long before the federal law, and it continues to enforce those provisions.

- **Mississippi:** Mississippi law (Miss. Code §19-5-359) requires any entity operating a shared tenant service (e.g. providing phone service to multiple unaffiliated businesses in a building) to **provide ANI and ALI for each 911 call made from any extension** intrado.com. In other words, if a single phone system serves multiple companies or residences (e.g. an office park or apartment complex PBX), the system must deliver a unique identifier for each extension's location when dialing 911. Mississippi also requires basic access to 911 (no restrictions on dialing out) for all phone systems intrado.com.

- **New Hampshire:** New Hampshire's statute (RSA 106-H and 378:40) places requirements on service providers and some enterprise operators. It mandates that telephone or VoIP service providers, as well as hotels, universities, etc., **deliver 911 calls with the ANI (caller's number) to the appropriate PSAP**, and, implicitly, that the location databases are kept updated intrado.com. While the law emphasizes the call routing and ANI, the state's E911 system will use that ANI to retrieve ALI. New Hampshire's 911 Board has rules encouraging dispatchable location, but much of the heavy lifting is now achieved through compliance with the federal rules.

- **New York:** New York took a more limited approach – focusing on ensuring **direct 911 access in certain buildings**. New York law (County Law § 303 and Exec. Law § 717-a) requires that any MLTS in a **public building** (state or local government buildings, schools, etc.) must allow a 911 call to be directly connected to a PSAP without dialing a prefix intrado.com. This became effective March 19, 2020 intrado.com. It does not explicitly mandate dispatchable location information, but practically, many New York government buildings have implemented solutions to provide location as well. For private businesses, New York does not have a specific MLTS law beyond relying on federal requirements.

- **Oklahoma:** Oklahoma passed a law in 2016 (effective Jan 1, 2017) requiring business owners using VoIP or MLTS to **enable direct 911 dialing and to provide a notification to a central location on-site when 911 is dialed** intrado.comintrado.com. This mirrors Kari's Law and also implies that systems should route emergency calls properly. While Oklahoma's statute (O.S. §1212) emphasized direct access and on-site notification, it also states that systems should provide the same level of 911 service as others in the area – which by interpretation includes providing ALI data if the local 911 system expects it. Thus, indirectly, Oklahoma pushes for dispatchable location by expecting MLTS to meet the standard E911 service level.

- **Pennsylvania:** Pennsylvania's MLTS provisions (35 Pa. Cons. Stat. §5311.16) differentiate residential vs. business. **Business MLTS operators must deliver 911 calls with an ANI and ALI "detailed to the building and floor location of the caller,"** or else establish a private answering point on-site intrado.comintrado.com. This is a clear dispatchable location requirement – the PSAP should see not just an address, but e.g. "123 Corporate Blvd – Building 4, 2nd Floor" as the location. If a business can't provide that, Pennsylvania law says they would need to have their own internal 24/7 answering point to field 911 calls (an alternative very few choose, since it's easier to just provide the location to the real PSAP). Residential MLTS (like a college dorm system) must provide a distinct ANI/ALI for each living unit intrado.com.

Pennsylvania also has requirements for on-site notification similar to Kari's Law. Non-compliance in PA can result in action by the Pennsylvania 911 Board and even disconnection of non-compliant systems after notice.

- **Tennessee:** Tennessee's 2019 legislation (Tenn. Code Title 7-86-, Part 4) essentially codified Kari's Law at the state level: any entity that owns a telephone system must allow 911 to be dialed without any prefix and must provide notification to a central location on-site when 911 is called intrado.com. While Tennessee's law focused on these two aspects (direct dialing and notification) intrado.com, it did not explicitly mandate dispatchable location. However, because Tennessee's 911 system is well-developed, most MLTS operators in Tennessee provide ALI info pursuant to the general requirement that 911 service be equivalent to others. Tennessee's approach illustrates that some states left the location specifics to existing E911 practices or federal law, while tackling the dialing and notification piece at the state level.

- **Texas:** Texas was home of Kari's Law's origin (due to a tragic incident in 2013) and had a state Kari's Law years before the federal one. Texas Health & Safety Code § 771.0712 and § 772.115 (for large counties) require that **MLTS serving residential customers provide the same level of 911 service, including ANI, as other residential phones**, and that business MLTS/VoIP systems allow direct 911 dialing and on-site notifications intrado.comintrado.com. Texas's Administrative Code (1 TAC 251.16) further specifies location identification: for example, in one populous county, MLTS must provide an **"adequate caller identification and location"** for 911 calls, which has been interpreted to mean each 911 call should come with a callback number and location information identifying the caller's location in the building intrado.comintrado.com. Texas also has a unique requirement in *Tarrant County* (Fort Worth area) that any MLTS provider for multi-business locations must ensure ANI/ALI for each call and specific location information for businesses served intrado.com. In effect, Texas law is a patchwork: Kari's Law principles statewide, with some local 911 districts imposing more granular location rules. Now with the federal dispatchable location rules, Texas entities are generally meeting those standards regardless.

- **Utah:** Utah's SB 14 (2017) requires that certain multi-line telephone systems **provide "sufficient information" to the PSAP indicating the caller's location**, and that the system must be capable of direct 911 dialing intrado.com. The statute (Utah Code 69-2-202) is somewhat general, but in practice it led to businesses ensuring that they work with Utah's 911 Division to have direct trunking to 911 centers with ANI/ALI. Utah's law effectively set the expectation of dispatchable location by saying the system must deliver information that allows the PSAP to locate the caller.

- **Vermont:** Vermont's statute (30 V.S.A. § 7057) explicitly embraces the dispatchable location concept. It requires that **any "enterprise communications system" (ECS, analogous to MLTS) shall provide to end users the same level of 911 service as others, including ANI signaling and "station identification data, including dispatchable location," to the E911 databases** intrado.com. Vermont thus wrote into law the exact term "dispatchable location," aligning state law with the federal definition. The law also mandates that ECS operators update the 911 database with any changes (moves, adds, changes to phones) and it authorizes the Vermont E911 Board to adopt detailed rules. As a result, Vermont's businesses and government agencies must ensure every phone line's record in the E911 system includes detailed location info (e.g. "Waterbury Office – 3rd Floor, RM 305") intrado.com. Vermont's law is considered a model for clear inclusion of dispatchable location.

- **Virginia:** Virginia's Code (§ 56-484.19 through 56-484.23) was updated by 2018 to require that **MLTS providers ensure any emergency call from their system is delivered to the PSAP **"with ANI and ALI, or an alternative method of providing call location information."** intrado.com. This language closely mirrors the FCC's two-prong approach – basically, provide the full ANI/ALI (number and dispatchable address) if you can; if you truly can't, you must have an alternate way to get location to responders. Virginia's law also required MLTS to be configured for direct dialing of 9-1-1 (even before the federal Kari's Law) and delegated enforcement to the Virginia 911 Board. Any MLTS installed after July 1, 2020 in Virginia must be compliant with these requirements, which practically means dispatchable location capability is mandatory intrado.com. Virginia provides exemptions for temporary installations and certain small systems, but those are limited.

- **Washington:** Washington State's regulations (RCW 80.36.560/.555) require residential MLTS providers to ensure each 911 call delivers a **unique ALI for the caller's unit**, and business MLTS providers to ensure each 911 call delivers a **unique ALI for the caller's telephone** intrado.comintrado.com. In effect, every extension or station in a Washington MLTS should have distinct ALI information, typically meaning the address and specific sub-address (floor/room). This has been in effect for some time in Washington, enforced by the state Enhanced 911 program. The state allows for some flexibility in rural areas, but generally any large building with many phones must break down its ALI records by floor or zone to comply with Washington law.

- **Illinois:** (Not listed in the Intrado summary but worth noting as of 2025) Illinois in 2022–2023 updated its 9-1-1 statutes to align with Kari's Law and RAY BAUM'S Act. In August 2019, Illinois had already required business service users in multi-story buildings to provide specific location info (like floor or suite) to the 911 system. In 2024, Illinois passed House Bill 5502 (Public Act

103-0545) to further **"streamline the 9-1-1 calling process"** and ensure MLTS systems support direct dialing and location gomindsight.comgomindsight.com. The new Illinois law (effective July 1, 2025) mandates that MLTS manufacturers and vendors **pre-configure systems to support direct 911 dialing** (echoing Kari's Law) and likely reinforces the requirement that the installed system be able to provide a dispatchable location. Illinois, having one of the largest 911 systems, has been aggressive in pushing compliance – the state's 911 administrator has authority to levy fines for MLTS non-compliance, and Illinois has provided grants to help school districts upgrade their phone systems for E911. By 2025, any entity in Illinois operating an MLTS is expected to not only comply with federal rules but also any additional state-level standards (which primarily ensure that *new* systems are compliant out-of-the-box and that dialing is as user-friendly as possible) gomindsight.com.

Compliance and Enforcement at State Level: States with MLTS 911 laws typically empower either the state 911 board or the state public utility commission to enforce them. Penalties can range from fines to, in extreme cases, ordering phone service disconnection until compliance is achieved. However, since the federal rules took effect, many states have coordinated their enforcement, often handling complaints locally but referring to FCC authority for broader compliance. It's important to note that **state laws often plug gaps that the federal law does not explicitly cover** or they accelerate timelines. For example, states like Massachusetts and Michigan imposed requirements on existing systems or on smaller businesses that might not be immediately covered by the FCC's forward-looking rules (which grandfathered existing equipment). Also, states can address purely intrastate aspects – e.g. requiring internal notification to local security beyond what the FCC mandates, or specifying the exact level of detail for ALI (like Michigan's 7,000 sq ft rule).

As of 2025, nearly all states that previously lagged in MLTS regulation have either updated their statutes or are in the process of doing so to harmonize with Kari's Law and RAY BAUM'S Act. Some states without dedicated MLTS laws simply rely on the federal law (since it preempts any less-strict state requirement) and their general 911 statutes. The overall trend is **uniformity**: enterprises nationwide must provide direct 911 access and dispatchable location, with state laws ensuring local accountability. For instance, Vermont and Virginia explicitly require "dispatchable location" by name intrado.comintrado.com, while others like Pennsylvania and Kentucky describe it in terms of building/floor detail intrado.comintrado.com – but the end result is similar.

States also continue to refine laws for special environments: e.g. some have separate provisions for schools, requiring classroom-specific 911 info; others address multi-building campuses, requiring at least building-level differentiation if not more. By 2025, no state outright contradicts the federal requirements – instead, states either match or exceed the federal baseline. **Entities operating in**

multiple states must thus be mindful of both the FCC's rules and any stricter state-level mandates (for example, an MLTS in Vermont definitely must include dispatchable location, whereas in a state like Arkansas the requirement might be met with just a station address since that was the state's phrasing).

Ongoing Developments and Future Outlook (as of 2025)

Since the implementation of RAY BAUM'S Act Section 506, several developments continue to shape the 911 landscape:

- **FCC Oversight and Potential Updates:** The FCC in 2021 opened an inquiry (PS Docket 21-343) into **911 fee diversion and further 911 improvements**, and in doing so it has touched on the need for continuing improvements in location accuracy. While there are no new rules proposed yet to supersede the dispatchable location requirements, the FCC is monitoring technologies like **z-axis (vertical) location for wireless** and could in the future consider whether similar vertical location data should be provided in enterprise settings (e.g. precise altitude or floor level from sensors). Any such changes would likely build on the foundation laid by Section 506 by refining the definition of dispatchable location to possibly include vertical coordinates for tall buildings.

- **Next-Generation 911 (NG911) Transition:** As states and localities upgrade to NG911 systems (IP-based 911 infrastructure), the ability to transmit rich location information (including indoor maps, floor plans, etc.) may increase. In 2025, Congress and the FCC are pushing for federal funding of NG911. One anticipated change is that **standards for dispatchable location will evolve** – for instance, using a uniform PIDF-LO format nationwide, and including not just text location but possibly geo-coordinates and building data. Service providers might have to adapt to new interfaces with NG911 core services, but these are technical evolutions rather than new legal mandates. The legal requirement for dispatchable location is expected to remain, but *how* that data is delivered could shift as NG911 deployment grows.

- **Enforcement and Compliance Rates:** Early reports indicate that compliance by enterprises has been improving but is not yet universal. By mid-2024, surveys suggested less than half of organizations were fully compliant with both Kari's Law and RAY BAUM'S Act, despite the laws being in effect gomindsight.com. The FCC has made examples of some non-compliant entities through enforcement actions, and this trend is likely to continue. Companies are now treating 911 compliance as a necessary part of corporate risk management (given liability concerns if a tragedy occurs and they weren't compliant). We anticipate **stricter auditing** by the FCC's

Public Safety Bureau and possibly collaboration with state 911 authorities to identify non-compliant MLTS (for example, through random test calls or responding to consumer complaints).

- **State Law Updates:** States continue to fine-tune their 911 laws. For example, **Illinois' 2024 law** shows that states may add their own refinements, such as requiring **vendors** to only sell compliant systems (to prevent outdated PBXs from being installed) gomindsight.com. Other states in 2025 are considering similar legislation to close any remaining loopholes. We might see more states explicitly incorporate the term "dispatchable location" in their statutes (following Vermont's lead) to make enforcement clear. In addition, states are expanding 911 obligations to newer technologies: e.g. some states have started looking at multi-line notification systems (like panic buttons in schools, IoT emergency call devices, etc.) to ensure they also transmit location to 911. These are not directly under Section 506, but the general push for better emergency location spans beyond phones.

- **Interplay with Federal Location Initiatives:** Apart from RAY BAUM'S Act, the FCC has separate ongoing proceedings for **wireless 911 location accuracy (vertical location)** and for **device-based hybrid location** (using handset sensor data for 911). By April 2025, nationwide wireless carriers are required to deploy dispatchable location or z-axis technologies in major markets (per FCC's Fourth Report & Order on wireless E911). This means that mobile callers in multi-story buildings may soon have their floor level delivered to PSAPs. The combined effect with RAY BAUM'S Act is a comprehensive improvement: a 911 caller from a VoIP office phone on the 10th floor will send a room number, while a 911 caller from a cellphone in the same building might send a latitude/longitude + floor estimate. Both aim to get responders to the right spot quickly. The FCC will be monitoring how these parallel efforts (dispatchable location for enterprise/VoIP and improved accuracy for wireless) complement each other. By late 2025 or beyond, the FCC could consider whether any additional legislative authority is needed to require, for example, that big tech companies providing voice services (like smart speaker 911 calls, etc.) also comply – but currently they are covered if they use the telephone network.

- **Public Awareness and Liability:** With these laws firmly in place, there is growing awareness in industry of the **liability for non-compliance**. Not only can companies be fined, but there have been lawsuits in incidents where 911 location was insufficient. The existence of clear statutes and FCC rules strengthens plaintiffs' positions. As a result, compliance with RAY BAUM'S Act has become a standard item in enterprise telecom audits and RFPs for new phone systems. Many companies in 2023–2025 have proactively upgraded older PBX systems specifically to

meet the dispatchable location requirement, often citing the law and the potential life-safety consequences. This trend will likely continue until legacy systems without these capabilities are phased out entirely.

In conclusion, the RAY BAUM'S Act (2018) and its Section 506 have had a transformative impact on emergency calling. The legislative history shows it was a well-intentioned, bipartisan effort to save lives by leveraging technology – ensuring that when someone calls 911, help can find them as fast as possible. The FCC's execution of the Act through detailed rules and deadlines has operationalized that intent. By 2025, we have in place a robust legal and technical framework: **any device, any phone system, anywhere in the U.S., should provide a dispatchable location with a 911 call** (or the best possible equivalent if true dispatchable location isn't feasible) docs.fcc.govdocs.fcc.gov. Ongoing efforts at both federal and state levels aim to fine-tune this framework, enforce compliance, and pave the way for next-generation 911 capabilities. The professional community – telecom providers, enterprise IT, public safety officials, and legal advisors – now treats Kari's Law and RAY BAUM'S Act compliance as a fundamental duty. The ultimate goal is that tragedies like those that inspired these laws will not recur, because no matter if a call comes from a hotel room, a school classroom, or a VoIP app, 911 dispatchers will see **exactly where the caller is** and help will arrive in the shortest time humanly possible.

Sources:

- Public Law 115-141, Division P ("RAY BAUM'S Act of 2018"), §506 – *Accuracy of dispatchable location for 9–1–1 calls* govinfo.govgovinfo.gov.
- **47 U.S.C. § 615 note** (RAY BAUM'S Act §506, requiring FCC 911 location rules) intrado.com; **47 U.S.C. § 623** (Kari's Law, MLTS direct dialing; added by Pub. L. 115-127) congress.gov.
- FCC Report and Order, **Implementing Kari's Law and Section 506 of RAY BAUM'S Act**, 34 FCC Rcd 6607 (2019) (FCC 19-76) – summarized at docs.fcc.gov docs.fcc.gov (new rules applying dispatchable location to MLTS, VoIP, etc.).
- **47 C.F.R. Part 9** (FCC 911 Rules): §9.3 (definitions: "Dispatchable location") ecfr.gov; §9.10(q)(10) (text-to-911 location deadline Jan. 6, 2022) federalregister.gov; §9.16(b) (MLTS dispatchable location requirements with Jan. 6, 2021/2022 deadlines) intrado.com; §9.17 (grandfathering of pre-2020 systems) intrado.com.
- National 911 Program (911.gov) – **Guidance on Kari's Law & RAY BAUM'S Act** (Oct. 2020) 911.gov911.gov; **Dispatchable Location Requirements for 911** (Oct. 2020) 911.govfederalregister.gov.

- Intrado Inc., **State & Federal E911 Regulations (MLTS)** – Summary of state MLTS 911 laws (2023) intrado.comintrado.com.
- Selected State Statutes and Regulations: **Arkansas Code § 12-10-317** (MLTS must transmit phone number and address) intrado.com; **Kentucky Rev. Stat. § 65.760** (residential MLTS must provide street address + unit/floor) intrado.com; **Massachusetts 560 CMR 4.00** (ANI/ALI required for new MLTS, dispatchable location detail) intrado.com; **Michigan Public Act 30 of 2019** (MLTS >7,000 sq.ft. must provide detailed location by 12/31/2020) plantemoran.com; **Pennsylvania Act 12 of 2015, 35 Pa.C.S. § 5311.16** (business MLTS 911 must include building and floor) intrado.com; **Vermont Stat. tit. 30, § 7057** (enterprise systems must provide ANI, station ID and dispatchable location) intrado.com; **Virginia Code § 56-484.19** *et seq.* (MLTS 911 calls must deliver ANI and ALI or alternative location) intrado.com.
- Mindsight (Tech blog), "**Kari's Law and RAY BAUM's Act: What's New in 2023**" (Sept. 5, 2024) – notes on FCC enforcement and Illinois legislation gomindsight.comgomindsight.com.
- FCC Press Release, **"FCC Adopts Rules to Help Americans Reach 911 and Be Located by First Responders"** (Aug. 1, 2019) docs.fcc.govdocs.fcc.gov.
- FCC Enforcement Advisory, **"Kari's Law and RAY BAUM'S Act Compliance"** (Sept. 2020) – (reminding of Feb 2020 and Jan 2021 deadlines) 911.govintrado.com.

Tags: ray baum's act, 911, dispatchable location, public safety, emergency services, telecommunications, fcc, legislation

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About ClearlyIP

ClearlyIP Inc. — Company Profile (June 2025)

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1. Who they are

ClearlyIP is a privately-held unified-communications (UC) vendor headquartered in Appleton, Wisconsin, with additional offices in Canada and a globally distributed workforce. Founded in 2019 by veteran FreePBX/Asterisk contributors, the firm follows a "build-and-buy" growth strategy, combining in-house R&D with targeted acquisitions (e.g., the 2023 purchase of Voneto's EPlatform UCaaS). Its mission is to "design and develop the world's most respected VoIP brand" by delivering secure, modern, cloud-first communications that reduce cost and boost collaboration, while its vision focuses on unlocking the full

potential of open-source VoIP for organisations of every size. The leadership team collectively brings more than 300 years of telecom experience.

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2. Product portfolio

- **Cloud Solutions** – Including *Clearly Cloud* (flagship UCaaS), **SIP Trunking**, **SendFax.to** cloud fax, **ClusterPBX OEM**, **Business Connect** managed cloud PBX, and **EPlatform** multitenant UCaaS. These provide fully hosted voice, video, chat and collaboration with 100+ features, per-seat licensing, geo-redundant PoPs, built-in call-recording and mobile/desktop apps.
- **On-Site Phone Systems** – Including CIP PBX appliances (FreePBX pre-installed), ClusterPBX Enterprise, and Business Connect (on-prem variant). These offer local survivability for compliance-sensitive sites; appliances start at 25 extensions and scale into HA clusters.
- **IP Phones & Softphones** – Including CIP SIP Desk-phone Series (CIP-25x/27x/28x), fully white-label branding kit, and *Clearly Anywhere* softphone (iOS, Android, desktop). Features zero-touch provisioning via Cloud Device Manager or FreePBX "Clearly Devices" module; Opus, HD-voice, BLF-rich colour LCDs.
- **VoIP Gateways** – Including Analog FXS/FXO models, VoIP Fail-Over Gateway, POTS Replacement (for copper sun-set), and 2-port T1/E1 digital gateway. These bridge legacy endpoints or PSTN circuits to SIP; fail-over models keep 911 active during WAN outages.
- **Emergency Alert Systems** – Including **CodeX** room-status dashboard, **Panic Button**, and **Silent Intercom**. This K-12-focused mass-notification suite integrates with CIP PBX or third-party FreePBX for Alyssa's-Law compliance.
- **Hospitality** – Including **ComXchange** PBX plus PMS integrations, hardware & software assurance plans. Replaces aging Mitel/NEC hotel PBXs; supports guest-room phones, 911 localisation, check-in/out APIs.
- **Device & System Management** – Including **Cloud Device Manager** and **Update Control (Mirror)**. Provides multi-vendor auto-provisioning, firmware management, and secure FreePBX mirror updates.
- **XCast Suite** – Including Hosted PBX, SIP trunking, carrier/call-centre solutions, SOHO plans, and XCL mobile app. Delivers value-oriented, high-volume VoIP from ClearlyIP's carrier network.

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3. Services

- **Telecom Consulting & Custom Development** – FreePBX/Asterisk architecture reviews, mergers & acquisitions diligence, bespoke application builds and Tier-3 support.
- **Regulatory Compliance** – E911 planning plus **Kari's Law**, **Ray Baum's Act** and **Alyssa's Law** solutions; automated dispatchable location tagging.

- **STIR/SHAKEN Certificate Management** – Signing services for Originating Service Providers, helping customers combat robocalling and maintain full attestation.
- **Attestation Lookup Tool** – Free web utility to identify a telephone number's service-provider code and SHAKEN attestation rating.
- **FreePBX® Training** – Three-day administrator boot camps (remote or on-site) covering installation, security hardening and troubleshooting.
- **Partner & OEM Programs** – Wholesale SIP trunk bundles, white-label device programs, and ClusterPBX OEM licensing.

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4. Executive management (June 2025)

- **CEO & Co-Founder: Tony Lewis** – Former CEO of Schmooze Com (FreePBX sponsor); drives vision, acquisitions and channel network.
- **CFO & Co-Founder: Luke Duquaine** – Ex-Sangoma software engineer; oversees finance, international operations and supply-chain.
- **CTO & Co-Founder: Bryan Walters** – Long-time Asterisk contributor; leads product security and cloud architecture.
- **Chief Revenue Officer: Preston McNair** – 25+ years in channel development at Sangoma & Hargray; owns sales, marketing and partner success.
- **Chief Hospitality Strategist: Doug Schwartz** – Former 360 Networks CEO; guides hotel vertical strategy and PMS integrations.
- **Chief Business Development Officer: Bob Webb** – 30+ years telco experience (Nsight/Cellcom); cultivates ILEC/CLEC alliances for Clearly Cloud.
- **Chief Product Officer: Corey McFadden** – Founder of Voneto; architect of EPlatform UCaaS, now shapes ClearlyIP product roadmap.
- **VP Support Services: Lorne Gaetz** (appointed Jul 2024) – Former Sangoma FreePBX lead; builds 24×7 global support organisation.
- **VP Channel Sales: Tracy Liu** (appointed Jun 2024) – Channel-program veteran; expands MSP/VAR ecosystem worldwide.

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5. Differentiators

- **Open-Source DNA:** Deep roots in the FreePBX/Asterisk community allow rapid feature releases and robust interoperability.
- **White-Label Flexibility:** Brandable phones and ClusterPBX OEM let carriers and MSPs present a fully bespoke UCaaS stack.

- **End-to-End Stack:** From hardware endpoints to cloud, gateways and compliance services, ClearlyIP owns every layer, simplifying procurement and support.
- **Education & Safety Focus:** Panic Button, CodeX and e911 tool-sets position the firm strongly in K-12 and public-sector markets.

In summary

ClearlyIP delivers a comprehensive, modular UC ecosystem—cloud, on-prem and hybrid—backed by a management team with decades of open-source telephony pedigree. Its blend of carrier-grade infrastructure, white-label flexibility and vertical-specific solutions (hospitality, education, emergency-compliance) makes it a compelling option for ITSPs, MSPs and multi-site enterprises seeking modern, secure and cost-effective communications.
