

**STATEMENT OF  
COMMISSIONER MICHAEL O'RIELLY**

*Re: Implementing Kari's Law and Section 506 of RAY BAUM's Act, PS Docket No. 19-\*\*\*; Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems, PS Docket No. 17-239.*

As I have repeatedly stated, when Congress provides the FCC with direction, I will faithfully implement their will. The vast majority of today's item seeks comment on the various provisions of the Kari's Law Act of 2017, requiring 9-1-1 direct dialing and related notification provisions for future multi-line telephone systems (MLTS), and a section of RAY BAUM'S Act, mandating the Commission to adopt rules to ensure that a dispatchable location is provided to public safety answering points, or PSAPs, when a 9-1-1 call is placed. For this reason, I generally support this notice.

I have concerns, however, that some portions of the notice stretch the law in directions not necessarily intended. For example, the item suggests expanding the definition of MLTS to include systems provided using IP technology and over-the-top applications. Assuming the legal authority issue is credibly answered, I am having a difficult time imagining how such an obligation would even work. How does the Commission envision regulating enterprise over-the-top VoIP apps – some of which already exist today – that can be created, updated and distributed from anywhere in the world?

Additionally, the Commission is considering whether operators of grandfathered MLTS systems should provide notification to callers, potentially in the form of stickers or labels, regarding how to call 9-1-1, even though Congress did not mandate this, and, in fact, Kari's Law placed no requirements on systems manufactured, imported, sold or installed before February 16, 2020. For those of us who were around in the early 2000s, we remember and recognize the insanity of the Commission's previous VoIP sticker mandate.

Similarly, in implementing RAY BAUM's Act, the Commission seeks comment on whether information besides a dispatchable address, such as x/y/z coordinates, should be voluntarily sent to PSAPs. It is hard to imagine why this information is necessary when dispatchable addresses is the gold standard for location accuracy. Further, the Commission appears to be taking this opportunity to dredge up old arguments to expand 9-1-1 VoIP services to those that provide outbound service only and do not permit any incoming calls, which are provided by smartphone applications.

I look forward to discussing these issues with interested parties as we proceed to order. I hope the Commission will implement the statute as written and will look to keep burdens to a minimum.