

**STATEMENT OF  
COMMISSIONER JESSICA ROSENWORCEL,  
APPROVING IN PART, DISSENTING IN PART**

Re: *Implementing Kari's Law and Section 506 of RAY BAUM's Act, Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems, Amending the Definition of Interconnected VoIP Service in Section 9.3 of the Commission's Rules, PS Docket Nos. 18-261, 17-239, GN Docket No. 11-117, Report and Order (August 1, 2019)*

In October of 1999, Congress designated 911 as the nationwide emergency number. Today, there are more than 240 million calls made to 911 every year. It's the number we count on when the unthinkable occurs.

That's what happened in December of 2013, when a nine-year old girl frantically dialed 911 for help from inside an East Texas hotel room. That call never went through. What she did not know was that the hotel's phone system first requires dialing "9" just to reach an outside line.

This is the worst kind of tragedy. It was preventable. And I thank the Chairman for bringing this story to this agency's attention and putting the shortcomings of multi-line telephone systems in the spotlight.

As a result, last year Congress passed Kari's Law, which aims to ensure that multi-line telephone systems like the one in that East Texas hotel room can directly call emergency services by dialing 911 without first dialing an access code. Today, we take steps to implement this new law here at the Federal Communications Commission. I am glad the Chairman has chosen to so expeditiously. This will save lives.

But this moment is bittersweet, for two reasons. First, our efforts today stem from tragedy. Second, our efforts do not go far enough to prevent another failure like the one that resulted in loss of life in that hotel room in December of 2013.

Let me explain. Today's order is meant to ensure that the public can directly call 911 from any multi-line telephone system. But our policies only apply on a going forward basis. That means nothing in our rules will require that East Texas hotel—or any other business operating a multi-line telephone system today—to change their system.

This is a glaring omission. That's why I asked to have this agency adopt rules that will require these businesses to inform the public about the 911 capabilities and limitations of their phone systems. But that request was rejected.

It's why I asked to have this agency seek comment on what kind of upgrades to existing multi-line telephone systems would trigger a requirement to comply with our new rules, so we might speed the transition to a world where *every* phone is capable of directly dialing 911. But that request was rejected.

It's why I asked that we adopt a timetable for bringing these systems into compliance with at least our 911 location requirements, instead of exempting them entirely. Indeed, the record evidence shows that most multi-line telephone systems today are capable of providing location information to first responders. Those that can't may need only a relatively small software upgrade. There is no sensible reason, then, to allow operators of these systems to continue avoiding the rules.

The reality is that in December 2013 a 911 call failed because the caller was not appropriately informed about how to use a multi-line telephone system to reach out for emergency assistance. Now, as new calling systems come to market that are capable of reaching 911 directly, this confusion will only grow. In fact, it's already happening. Just read press stories about Kari's Law. Many of them suggest that starting in February of 2020, you will be able to dial 911 from any multi-line telephone system. But we know that with millions and millions of old telephone lines still out there operating on these systems, this is not true. We should be clearing up this confusion. It could cost lives.

In closing, I fully support our efforts today to ensure that going forward new multi-line telephone systems will have to implement the 911 direct dial and notification requirements of Kari's Law. I fully support our efforts today to impose technologically neutral dispatchable location requirements. But as long as there is a phone system in an East Texas hotel—or any other building—that is unable to reach 911 directly, I think we have more work to do. As long as the public remains unsure how to reach 911 from the phone they are using—I think we have more work to do. So I dissent in part because we do not adopt any requirements for enterprises to inform callers about the 911 limits of their phone systems, because we do not provide any guidance about when upgrades to existing phone systems will trigger the rules we adopt today, and because we exempt the embedded base of millions of multi-line telephone systems from complying with location requirements.