

**STATEMENT OF  
COMMISSIONER GEOFFREY STARKS  
APPROVING IN PART, DISSENTING IN PART**

Re: *Implementing Kari's Law and Section 506 of RAY BAUM'S Act*, PS Docket Nos. 18-261 and 17-239, GN Docket No. 11-117.

Nearly 660,000 calls are made to 911 each day. For many callers, that day may be the worst day of their lives. They need to know that their call will go through and that help will soon be on the way. They shouldn't have to think about whether they're calling from their mobile phone, their home line, or their office or school. They shouldn't have to think about whether they're calling from a new phone system or an old one. All they need to think about is the emergency at hand.

I heard about the importance of 911 services from operators I visited in Las Vegas this Spring and earlier this week in Brooklyn. Time and again, 911 operators told me about callers reaching them in the worst possible circumstances, when the lives of friends and family members were in danger and where seconds mattered – literally making the difference between life and death. In Las Vegas, I learned about 911 operators taking calls from and getting help to people under fire from the mass shooter a little more than two years ago. In Brooklyn, I listened to 911 calls in real-time, including one where a mother pleaded for an ambulance for a child who was having trouble breathing. Time and again, these 911 operators handled these calls with empathy and professionalism.

Today's item is another positive step in the Commission's ongoing effort to ensure that our 911 system meets Americans' expectations. As the lines between different types of communications technologies continue to disappear, the Commission must update its policies so that all users receive the same protections, regardless of the platform that they're using. This is most critical in the context of 911 calls, where someone's survival may depend on that call getting through.

While these rule changes are a great step forward, I wish we could have done more. Kari's Law may apply only to systems going forward from February 2020, but the person calling 911 doesn't care when her system was installed. All she cares about is that she's trying to reach 911 and her call isn't going through. I would have supported reasonable notice requirements for legacy MLTS, similar to state laws in Texas and Utah that require placement of a sticker or notice near non-compliant MLTS devices explaining how to reach 911. As the National Association of State 911 Administrators has pointed out, this simple fix could help avoid future tragedies like the one that gave rise to Kari's Law in the first place. On a related note, our rules are too vague about the level of improvements to an existing MLTS that should trigger compliance with Kari's Law. That's why I supported issuance of an FNPRM that would have sought comment about this issue. MLTS operators, installers and managers already know enough about their existing systems to anticipate the likely upgrades in those systems. The stakes are too high to delay action.

Finally, consumers expect that when they call 911, emergency responders should be able to find them. This item establishes the automated provision of location information as the preferred approach, but also permits the use of information derived from manual entry or "alternative location information" such as xyz coordinates or data from Wi-Fi/access points. In the order the Commission states that it believes these other options should sufficiently identify a caller's civic address and approximate in-building location, including floor level and approximate location on the floor.

But in some cases, manual entry may not be accurate or possible; for example, if the caller is incapacitated, if they don't know their floor or their location on it, or if the seconds it takes to gather and provide that information take critical time away from a first responder's arrival. That's why I sought addition of an FNRPM to this item that would have asked how and when we could transition systems relying on manual entry to the other two approaches. Similarly, I supported Commissioner

Rosenworcel's proposal to seek comment on transitioning legacy systems to provide dispatchable location information. Unfortunately, the majority rejected these proposals, which I believe would have led to better systems and improved public safety.

Nevertheless, while not perfect, I believe this item overall is a good step forward to improving 911 services, and I look forward to implementation of these important requirements. Thank you to the staff in the Public Safety and Homeland Security Bureau for their work on this item.