



Mitel Regulatory Bulletin: Kari's Law and Ray Baum's Act

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Kari's Law and Ray Baum's Act

Mitel is pleased to provide our partners and customers with this bulletin containing general educational information about Kari's Law and Ray Baum's Act, as well as Mitel product information.

Kari's Law

Kari's Law, which came into effect on Feb 16, 2020, places obligations on multiline telephone system ("**MLTS**") manufacturers, importers, lessors, installers, managers, and operators. Kari's Law is implemented by rules set out in [FCC 19-76](#), which was released in August 2019.

Persons who **manufacture, import, sell, and/or lease a** MLTS must ensure that the MLTS software/hardware includes a setting that, when turned on, enables users to directly dial 911 (i.e. without dialing any additional digit, code, prefix, or post-fix) from any station equipped with dialing facilities as soon as the system is able to initiate calls to the Public Switched Telephone Network ("**PSTN**").

Persons who **install, manage and/or operate** a MLTS must configure the MLTS' settings so that once installed the MLTS is fully capable of:

- (i) a user dialing 911 directly from any station equipped with dialing facilities as soon as the system is able to initiate calls to the PSTN; and
- (ii) sending 911 call notifications to a central location at the facility where the system is installed or to another person or organization at a different location (e.g. central or other location) if the MLTS is capable of doing so without an improvement to the hardware or software of the system.

FCC 19-76 does not prohibit indirect dialing of 911 (e.g. 9911) provided that direct 911 is enabled.

Information for Mitel Partners and Customers

Mitel is typically the installer, manager and operator (the operator role is typically shared with customer) of its retail cloud solutions which include PSTN access. Mitel partners or customers are typically the installer, manager and/or operator of wholesale cloud MLTS solutions which do not include PSTN access, and on-premise MLTS solutions.

FCC 19-76 details specific 911 call notification requirements. Both these requirements, and Mitel product documentation, should be reviewed carefully by any person engaged in the business of installing, managing and/or operating an MLTS prior to installation and/or operation. Mitel recommends that partners and customers installing, managing or operating a wholesale cloud MLTS or on-premise MLTS ensure that they have a clear understanding of our technology and obtain independent legal advice in respect of Kari's Law.

Mitel recommends upgrading systems which do not comply with Kari's Law as a best practice. However, Kari's law is prospective only and does not require upgrading such systems if they are already in existence as of Feb

15, 2020. However, after Feb 16, 2020, independent legal advice should be obtained prior to upgrading (or increasing the capacity of) any non-compliant systems deployed prior to Feb 15, 2020 as these actions may trigger Kari's Law requirements.

Ray Baum's Act

Ray Baum's Act required the FCC to conclude a proceeding to adopt rules to ensure that a "dispatchable location" is conveyed with 911 calls regardless of the technological platform used, including MLTS. The FCC conducted such a proceeding and the resulting order, FCC 19-76, was released in August 2019.

The new rules affect fixed and non-fixed devices attached to both interconnected VoIP ("iVoIP") services and MLTS systems. In both cases, a dispatchable location must accompany all 911 calls initiated from fixed and non-fixed devices by January 6, 2021, and January 6, 2022, respectively.

The FCC defined a fixed device as a device which cannot be moved by the user without administrative intervention. In Mitel's view, fixed devices include any analog (or digital) phone which is plugged into a traditional telephone jack which, through fixed in-building wiring (e.g. within floors, ceilings, walls etc.), uses an analog telephone adapter device, or similar, to connect to the iVoIP Service or MLTS. Mitel does not consider the following to be fixed devices: (1) Internet Protocol ("IP") phones which can connect to the VoIP Services or MLTS through any office ethernet jack or wireless network, (2) teleworker enabled IP phones, or (3) softphones operating on desktop, laptop or mobile devices.

Information for Mitel Partners and Customers

Fixed Devices

Retail Cloud Solutions Which Include PSTN access

In its provision of retail cloud solutions which include PSTN access, Mitel acts as an iVoIP service provider. As such, Mitel will provide to the PSAP with each 911 call the dispatchable location which has been assigned to each customer fixed device. However, Mitel has no understanding of the physical layout of customer premises. As such, it is the customer's sole responsibility to assign a dispatchable location to each fixed device within their Mitel retail cloud system. Customers who have partners are encouraged to reach out to their partner for assistance.

On-Premises Deployments

Mitel considers purchases of on-premises PBXs (with or without SIP trunks¹) to be purchases of a MLTS and not an iVoIP service. Mitel does not typically operate the MLTS. If Mitel operates your MLTS please contact

¹While Mitel may charge universal service fee and/or e911 charges on Mitel SIP trunks, Mitel has no control over the customer's premise or use of the trunks and cannot itself provide dispatchable location as it has no way of knowing the dispatchable location. Dispatchable location is the customer's sole responsibility. Mitel will not interfere with dispatchable location information transmitted over Mitel SIP trunks.

Mitel directly.

Where a customer purchases a MLTS directly from Mitel, as between Mitel and the customer, it is the customer's legal responsibility to implement dispatchable location as customer will be the operator/manager of the MLTS.

Where partners resell Mitel MLTS, as between Mitel and the partner, it is the partner's legal responsibility to work with its customers to implement dispatchable location. In this case, the partner, its customer, or a third party will be the operator/manager of the MLTS.

Dispatchable location product information can be found in the Product Information section below.

Additional Customer Emergency Services IDs ("CESID")s are available with SIP trunks purchased from Mitel at standard pricing. Where third party SIP trunks are involved, CESIDs must be obtained from the third party SIP provider.

Mitel would be pleased to provide customers and partners with configuration assistance through a professional services engagement, if desired.

In Mitel's view, all MLTSs regardless of deployment date must be configured to provide dispatchable location for fixed devices. Mitel recommends that customers and partners obtain independent legal advice to properly understand their dispatchable location requirements.

Wholesale Cloud MLTS Which Does Not Include PSTN Access

Partners are purchasing a wholesale cloud based MLTS (which does not include PSTN access), and not an iVoIP service, from Mitel.

As between Mitel and partner, it is the partner's legal responsibility as the operator/manager of the MLTS to implement dispatchable location for its customers and Mitel requires all partners to do so immediately.

Dispatchable location product information can be found in the Product Information section below.

Mitel would be pleased to provide partners with configuration assistance through a professional services engagement, if desired.

Mitel recommends its partners obtain independent legal advice to properly understand their dispatchable location requirements.

Non-Fixed Devices

Mitel is currently working on dispatchable location for non-fixed devices for the January 6, 2022 deadline. This bulletin will be updated as more information becomes available.

[Mitel Product Information](#)

[Mitel Cloud Solutions](#)

MiCloud Connect

Kari's Law

MiCloud Connect deployments enable users to directly dial 911 (i.e. without dialing any additional digit, code, prefix, or post-fix) from any station equipped with dialing facilities as soon as the system is able to initiate calls to the PSTN.

As of November 1, 2020, email-based 911 alerts have been added to and are enabled on MiCloud Connect deployments in the United States by default. The alerts are sent to the "location emergency contacts." Each alert contains the caller's profile (e.g. name, phone number and service location), emergency location registration (e.g. emergency callback number and registered emergency location) and time and date of the call. Alerts are initiated contemporaneously with 911 calls and do not delay the call.

Customers may change the emergency contact email notification recipients through the MiCloud Connect portal.

Dispatchable Location

The customer is responsible for assigning a dispatchable location to each fixed device. Once the customer has provided dispatchable locations to Mitel through the customer portal, MiCloud Connect will deliver a dispatchable location to the Public Safety Answering Point ("**PSAP**") with each call initiated from a fixed device.

MiCloud Flex

Kari's Law

Retail United States MiCloud Flex deployments enable users to directly dial 911 (i.e. without dialing any additional digit, code, prefix, or post-fix) from any station equipped with dialing facilities as soon as the system is able to initiate calls to the PSTN.

As of Feb 16, 2020, phone and console-based 911 alerts consisting of a visual display and a tone will be enabled on all new retail MiCloud Flex deployments in the United States. Alerts will be delivered to up to 32 phones and consoles chosen by the customer. The alert, which contains the time and date of the call, the caller's internal extension number as well as a configurable description of the caller, is initiated contemporaneously with a 911 call, and does not delay the call. Mitel recommends that 911 alerts be enabled in all Flex deployments. Retail customers with deployments pre-dating Feb 16, 2020 in which alerts are not enabled should contact Mitel if they would like 911 alerts enabled.

Dispatchable Location

Customer is responsible for assigning a dispatchable location to each fixed device. Once customer has provided dispatchable locations to Mitel, retail MiCloud Flex will deliver a dispatchable location to the PSAP with each call initiated from a fixed device. The best method for updating fixed device dispatchable location is the MiCloud Flex portal.

Wholesale MiCloud Flex deployments can implement dispatchable location using CESIDs. It is partner's legal responsibility to work with its customers to determine the number of CESIDs which are required to present a dispatchable location with each 911 call and ensure that the requisite CESIDs are appropriately configured in the end customer's Mitel MLTS (and registered with the PSAP). Partners are free to implement automated

dispatchable location using an alternative methodology.

Mitel On-Site Solutions

MiVoice Business

Kari's Law

MiVoice Business PBXs licensed in the United States contain a setting which allows the customer or partner to enable users to directly dial 911 (i.e. without dialing any additional digit, code, prefix, or post-fix) from any station equipped with dialing facilities as soon as the system is able to initiate calls to the PSTN.

MiVoice Business PBXs licensed in the United States can be configured by the customer or partner to provide phone and console-based 911 alerts consisting of a visual display and a tone. The alert is capable of being sent to as many as 32 phones and consoles chosen by the customer. The alert, which contains the time and date of the call, the caller's extension number as well as a configurable description of the caller, is initiated contemporaneously with a 911 call, and does not delay the call. Mitel recommends that 911 alerts be enabled in all MiVoice Business PBXs. Customers or partners currently using MiVoice Business PBXs without 911 alerts are encouraged to enable alerts at this time.

Dispatchable Location

Dispatchable locations for fixed devices can be implemented on MiVoice Business PBXs licensed in the United States using CESIDs. It is customer's or partner's, as the case may be, legal responsibility to determine the number of CESIDs which are required to present a dispatchable location with each 911 call and ensure that the requisite CESIDs are appropriately configured in the Mitel MLTS (and registered with the PSAP). The customer or partner are free to implement automated dispatchable location using an alternative methodology.

MiVoice Connect

Kari's Law

MiVoice Connect PBXs licensed in the United States contain a setting which allows the customer or partner to enable users to directly dial 911 (i.e. without dialing any additional digit, code, prefix, or post-fix) from any station equipped with dialing facilities as soon as the system is able to initiate calls to the PSTN.

The MiVoice Connect PBX does not support notice to a central (or other location) when 911 is dialed. Mitel Revolution, which provides additional 911 alert functionality, can be purchased separately for use with MiVoice Connect.

Dispatchable Location

Dispatchable locations for fixed devices can be implemented on MiVoice Conect PBXs licensed in the United States using CESIDs. It is customer's or partner's, as the case may be, legal responsibility to determine the number of CESIDs which are required to present a dispatchable location with each 911 call and ensure that the

requisite CESIDs are appropriately configured in the Mitel MLTS (and registered with the PSAP). The customer or partner are free to implement automated dispatchable location using an alternative methodology.

MiVoice Office 400

Kari's Law

MiVoice Office 400 PBXs licensed in the United States contain a setting which allows the customer or partner to enable users to directly dial 911 (i.e. without dialing any additional digit, code, prefix, or post-fix) from any station equipped with dialing facilities as soon as the system is able to initiate calls to the PSTN.

MiVoice Office 400 PBXs licensed in the United States can be configured by the customer or partner to provide phone and console-based 911 alerts consisting of a visual display and a tone. The alert is capable of being sent to as many as 32 Mitel SIP phones and consoles chosen by the customer. The alert, which contains caller name, the caller's internal extension number, as well as a configurable description of the caller, is initiated contemporaneously with a 911 call, and does not delay the call. Additionally, a 911 notification email including caller name, extension number as well as a configurable description of the caller can be enabled. Emails are initiated contemporaneously with a 911 call, and do not delay the call. Mitel recommends that 911 alerts and emails be enabled in all MiVoice Office 400 PBXs. Customers or partners currently using MiVoice Office 400 PBXs without 911 alerts and emails are encouraged to enable alerts and emails at this time.

Dispatchable Location

Dispatchable locations for fixed devices can be implemented on MiVoice Office 400 PBXs licensed in the United States using CESIDs. It is customer's or partner's, as the case may be, legal responsibility to determine the number of CESIDs which are required to present a dispatchable location with each 911 call and ensure that the requisite CESIDs are appropriately configured in the Mitel MLTS (and registered with the PSAP). The customer or partner are free to implement automated dispatchable location using an alternative methodology.

MiVoice Office 250

Kari's Law

MiVoice Office 250 PBXs licensed in the United States contain a setting which allows the customer or partner to enable users to directly dial 911 (i.e. without dialing any additional digit, code, prefix, or post-fix) from any station equipped with dialing facilities as soon as the system is able to initiate calls to the PSTN.

MiVoice Office 250 PBXs licensed in the United States can be configured by the customer or partner to provide 911 alerts consisting of a visual display and a tone on consoles and phones designated as "administrator phones". The alert, which contains the time & date of the call, the caller's name and extension number, is initiated contemporaneously with a 911 call, and does not delay the call. Additionally, a 911 notification email

including caller name and extension number can be enabled. Emails are initiated contemporaneously with a 911 call, and do not delay the call. Mitel recommends that 911 alerts and emails be enabled in all MiVoice Office 250 PBXs. Customers or partners currently using MiVoice Office 250 PBXs without 911 alerts are encouraged to enable alerts at this time.

Dispatchable Location

Dispatchable locations for fixed devices can be implemented on MiVoice Office 250 PBXs licensed in the United States using CESIDs. It is customer's or partner's, as the case may be, legal responsibility to determine the number of CESIDs which are required to present a dispatchable location with each 911 call and ensure that the requisite CESIDs are appropriately configured in the Mitel MLTS (and registered with the PSAP). The customer or partner are free to implement automated dispatchable location using an alternative methodology.

Frequently Asked Questions

- **I don't want notice of a 911 call to a central (or other location) enabled on my U.S. retail MiCloud Flex solution.**

As of Feb 16, 2020, notice of a 911 call to a central (or other location) will be enabled for all new retail customers in the United States. If you instruct Mitel to turn this feature off, Mitel will comply with your request, however any legal liability related to Kari's Law will lie with your organization, not Mitel. Mitel recommends that you obtain independent legal advice prior to advising Mitel to turn off this feature.

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