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New 911 Requirements for Hotels and Businesses

On Feb. 16, 2018, President Trump signed into law a requirement that multi-line telephone systems (MLTS) used by hotels, hospitals, campuses and other businesses be configured to allow persons to dial 911 from any phone on the system without having to dial extra digits, for example, by dialing 9 first to reach an outside line. The new law is called “Kari’s Law Act of 2017” in honor of Kari Hunt, who was killed in a hotel room while her 9-year-old daughter tried to call 911 without realizing she had to dial extra digits.

The requirement applies to traditional telephone systems such as on-premises PBXs or network-based Centrex systems as well as new VoIP-based systems. The law also requires that MLTS be designed to notify a central contact at the facility when a 911 call is made if the system can be configured to provide such notifications “without an improvement to the hardware or software of the system.” The law will be enforced against persons who manufacture, import, sell, install, manage or operate multi-line systems that are made, sold or installed two years after the date of enactment, and it authorizes the Federal Communications Commission (“FCC”) to levy fines against those who fail to comply with the new requirements. The Senate amended the law to provide that it “shall apply with respect to a multi-line telephone system that is manufactured, imported, offered for first sale or lease, first sold or leased or installed after the date that is 2 years after the date of the enactment of this Act.” There is some uncertainty as to whether the law would require retrofitting of existing systems.

On a separate track, the FCC has initiated its own proceeding to assess whether national rules may be necessary to ensure that these enterprise phone systems, including newer cloud-based telephone systems, have up-to-date 911 capabilities, including direct dialing, location accuracy and call back number information. (See our alert on the FCC proceeding [here](#).) It is unclear whether the agency will seek to issue regulations further implementing Kari’s Law either separately or as part of that proceeding. During final debate on the legislation in the House, several Democrats expressed disappointment that Kari’s Law did not also include provisions regarding location accuracy. Location accuracy refers to information sent to 911 call centers on the exact location, for example, a specific room or office, from which the 911 call is made.

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This document is intended to provide you with general information regarding new phone system requirements for hotels and other businesses. This memorandum is not intended to provide specific legal or tax advice. If you have any questions or if you need legal advice as to a specific benefit plan or employment law issue, please contact one of the following members of the Brownstein Hyatt Farber Schreck Employee Benefits Executive Compensation Group or Employment Law Group: