

## Dialing 911 From Offices or Hotels – Potential New Regulations

The FCC is assessing whether additional federal regulations are needed to ensure that workers in office buildings or hotel guests have access to up-to-date 911 services when the business owner uses new IP communications systems such as cloud-based services. The FCC is concerned that enterprise 911 capabilities lag behind wireline, wireless or interconnected VoIP services in terms of 911 location accuracy and accessibility.

Specifically, the FCC wants to know whether workers in office buildings or guests in hotels need to dial extra digits (e.g., dial 9 first) before dialing 911; whether public safety officials will receive a call-back number to reach the caller directly; and whether information is sent identifying the location (e.g., floor or specific office or room) of the caller.

The FCC is taking the first step toward potential new regulation by seeking comprehensive information regarding 911 services in office buildings, campuses and hotels. Information is being sought from service providers, equipment manufacturers and business owners. Comments are due Nov. 15, 2017, and reply comments on Dec. 15, 2017.

### Background

To date, the FCC has deferred to the states in adopting specific 911 enterprise rules. As of 2016, 24 states had enacted, or had pending, legislation governing 911 service to enterprise locations. The FCC's notice of inquiry (available [here](#)) helpfully contains an appendix briefly summarizing existing state requirements for 911 capabilities of what the FCC calls enterprise communications systems or ECS.

### What's the Issue?

The FCC wants to ensure that persons working in office environments, or staying in hotels, will have their calls routed to the correct public safety office and that the public safety officials will have accurate location information so they know where to send emergency responders. First responders want to know not only a street address, but, if possible, the specific floor or room from which the 911 call is made. If a person is working remotely, they need to have the address from which the person is calling, not the address of corporate headquarters. They need to know a call-back phone number to reach the person calling 911, not just a general corporate number. And persons making 911 calls on an ECS should know if they need to dial an access number—like dialing 9—to reach an outside number. Many states have adopted direct dialing requirements, known as Kari's Law, and, at this writing, Congress is debating adoption of a similar federal requirement. (The law is named after Kari Dunn, who was murdered after her 9-year-old daughter unsuccessfully attempted to dial 911 from a hotel room that required dialing "9" before dialing 911.)

### What Does the FCC Want to Know?

The FCC is asking dozens of questions regarding the state of ECS 911 services, including how ECS is being offered and by whom, current 911 capabilities, effectiveness of state laws, costs of compliance, and whether there

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is a need for a more uniform, federal approach. The FCC is seeking information from business and hotel owners, service providers and operators, equipment vendors, and state and local officials.

## What Happens Next?

After collecting information, the FCC will determine whether federal rules are required or whether voluntary, best practice guidance and standards are sufficient. If the FCC proceeds, it will issue a notice on proposed new rules or guidance that will provide further opportunity to comment on the FCC's specific proposals.

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