Telecom and Legal Considerations in 911 Planning:
The Importance of a Team-Based Approach

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Written by:
Martha Buyer, Attorney
Law Offices of Martha Buyer, PLLC

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Introduction

Planning for emergencies in an enterprise environment is very tricky business, plain and simple. It is particularly challenging when employees, guests, contractors and others are working behind a multiline telephone system (MLTS). In a widely quoted (but unsubstantiated) Department of Labor report, it has been estimated that no fewer than 60 million people work in multi-building campuses or high-rise buildings behind multiline telephone systems, including PBXs. Your company’s employees likely are included in that count.

Great attention must be paid to making sure that such individuals have access to speedy emergency response should the need arise. The thoughtful planning, execution and expense required to deploy an appropriate and successful 911 solution is best viewed like insurance – it is either a black hole for money or the ultimate best investment. Employee safety should be enough of a motivator to convince your enterprise to dedicate the resources required to get emergency planning right. But there are legal obligations and penalties for failing to provide a safe workplace, too.

In the days when employees and contractors were tethered to their desks, managing access to 911 was, although imperfect, without some of the challenges posed by the current work environment. Specifically, as a result of increased mobility and the proliferation of IP technologies, managing useful identification and location information has become exponentially more difficult than it has ever been. The ability of employees to be physically in one place with calling information displaying somewhere else has made the job of location identification both labor and time intensive.

What has not changed is that when seconds count, the information sent to the dispatcher must be accurate and appropriate. It is considerably more challenging to provide accurate information than it used to be. This white paper will provide a foundation for communications technology, risk management, public safety and legal professionals, among others, to begin examining their enterprises’ potential liability and planning for the most efficient management of emergency information.

Technology Considerations

Back when traditional voice was the dominant platform for communicating with a Public Safety Access Point (PSAP), voice call routing information was based upon three distinct components: ANI/ALI (automatic number identification/automatic location information), class of service and customer account information. The existing infrastructure necessary to support these calls has been in place for 40 years.

At a minimum, the current network that handles the incoming call when 911 is dialed is capable of handling information based on these three primary elements. The problem is that many people, both within and outside of the enterprise structure, are...
Technologies supported by individual PSAPs vary widely and cannot be counted on as reliable sources of location information in an emergency.

often not using traditional voice services when they make calls for emergency help. Newer technologies – including wireless, SMS, social media and Web access – may not be supported by the PSAP.

Although the technology exists to support newer technologies from the PSAP side of the equation, it has not been deployed in many of the 6,092 PSAPs that exist in the U.S. today, most often for budgetary reasons. PSAPs also were not engineered – and thus not prepared – for the ubiquitous deployment of wireless devices. Converting all PSAPs to enable them to accommodate newer technologies has been, and continues to be, simply too costly to implement in a relatively short time frame. Other demands on limited public safety funds have been given priority.

Unfortunately, there are too many examples of people making calls to 911 from devices that are not supported by the PSAP with disastrous consequences. Even if the message is delivered, location information can be delayed, making all the difference when time truly is of the essence. For example, three people perished in a fire in Buffalo in 2009. The call was made to 911 from a wireless device, and while no one knows at what point in the course of the fire the call was made, by the time the first responders arrived on the scene, the three had died. Bottom line:

Technologies supported by individual PSAPs vary widely and cannot be counted on as reliable sources of location information in an emergency. While calls to 911 made from within the enterprise are usually the most reliable way of reaching a dispatcher most quickly, employers shouldn’t hesitate to make anyone on the premises—but particularly employees and contractors – aware of the limitations of contact made from anything other than a landline (including text, social media and wireless devices), from within the enterprise, for emergency assistance. Not only should employees and visitors be encouraged to use landlines to make such calls, but they should also be made aware of the technology limitations that may not support the most direct access to dispatchers and ultimately first responders.

Every enterprise has its own methods of dealing with emergency calls – your enterprise might enable plain “911” or “9-911,” for example. What is critical, however, is that particularly if the numbers to be pressed are anything different than just plain old 911, that notice be clear and obvious at every possible location from which a call is to be made.

The Continuing Evolution of E911

Many people involved in emergency response refer to 911 services generically as E911 or “Enhanced 911.” But 911 services are evolving to Next-Generation 911 or NG 911. The capabilities of the improved 911 technology can accommodate the technologies that many people currently use to reach out in an emergency. Once fully deployed, NG 911 PSAPs will bring a whole new level of accurate detail with a minimum number of characters to the dispatcher.

NG 911 is supported by a variety of upgrades to the underlying technologies of E911. While traditional E911 information is TDM circuit-based, NG 911 is Ethernet-based. E911 supports voice calls only (single mode), while NG 911 can support information in a variety of formats including not only voice, but data, video, picture and text. With E911, location information is provided by ANI/ALI, while with NG 911, location information is provided by PIDF-LO (Presence Information Data Format –
Location Object), making location identification considerably more precise than it has been with E911. Additionally, with PIDF-LO, the origination endpoint can send actual location information instead of sending a “look-up key” such as a phone number. With NG 911, the local data can be more real-time and dynamic.

NG 911 will bring considerably more sophistication and explicit information to the dispatcher. In the interim, despite aggressive schedules for deployment of more sophisticated PSAPs, E911 remains the predominant technology. Enterprises should educate those in their buildings of what devices to use and how to use them in the meantime.

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<th>E911</th>
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<tr>
<td>TDM circuit-based</td>
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<td>Voice calls only (single mode)</td>
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<td>Location information provided by ANI/ALI</td>
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<td>Sends “look-up key” such as a phone number</td>
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### Negligence and Liability 101

How an enterprise prepares for emergency calling has important implications – not just for the safety of end users, but for the company’s liability as well. Looking beyond simply what the “right thing to do” is, enterprises have obligations to employees, contractors and guests to provide a safe workplace. While some states are much more specific about defining those obligations than is the federal Occupational Safety and Health Administration (OSHA), others have yet to weigh in on this critical topic. Even in the absence of state law, basic responsibilities related to negligence and liability often propel enterprises to take steps to ensure that they create and maintain a safe environment for those who work and live behind multi-line telephone systems. Others that may not be under statutory pressure have not always rushed to tackle the potentially thorny and costly issue.

In what may be the second shortest description of Tort law (the law of negligence and liability) on record (the shortest being simply “be careful”), here is a very brief overview of the most fundamental concepts governing the law of negligence: “Negligence” is classified as either negligence, negligence *per se* or gross negligence, most of which are governed by state law (except in those instances where federal rules and regulations are designed to protect employees in a specific industry). These are standard subsets of the larger umbrella of Tort law, but they can be used as a cause of action by an individual who was harmed by – or whose condition was made worse by a failure of — a 911 configuration that did not function properly or adequately.

Very broadly in the employment context, traditional negligence occurs when an employee is intentionally exposed to a known danger, when the employer has failed to take safety precautions or when the employer has failed to inform employees of risks or dangers. The bottom line in any determination of negligence is whether, in the case at
hand, the employer knew or should have known the dangers and risks associated with its business, and whether it conducted itself reasonably. The magic word here is “reasonable.” What would a reasonable employer do in similar circumstances? More specifically, these four questions must be asked and answered in order for there to be a finding of negligence.

- Was there a duty of care owed to the employee by the employer?
- Was there a breach of that duty?
- Were there damages or injuries?
- Were those damages or injuries a result of that breach?

Negligence *per se* is a more specific tort that usually carries with it more severe penalty than does traditional negligence. In the employment context, so long as the plaintiff (employee) is a member of the class that was intended to be protected, there is liability any time the defendant’s (employer’s) action or inaction results in an injury, and where the injury was caused by the action or inaction of the defendant. Simply put, in order to be found liable under a theory of negligence *per se* the plaintiff must ask: Is there a statute in place which defines a duty for the benefit of a particular class of people? If the answer is “yes,” and if the employer can be found responsible for not having met the defined duty, there will generally be a finding of responsibility under negligence *per se*.

Gross negligence is the level of negligence that carries the most severe penalties, including potential punitive damages (as in amounts of money designed to “punish” the offender). Gross negligence involves “reckless disregard” for the safety of others. As an example, although a court decision has yet to be made regarding whether BP was grossly negligent in the Gulf oil spill of 2010, if the company and its subcontractors are deemed to have been so negligent, fines, which are estimated to be in the billions of dollars to begin with, could be tripled because of the imposition of punitive damages.

If your enterprise were to be taken to court for alleged negligence in relation to a botched emergency call, the court would evaluate whether a “reasonable” employer would have behaved in the same manner to protect those who work and/or live behind its PBX. The jury will be asked to consider, among other factors, what is reasonable under the circumstances. And, of course, there are no easy answers.

**Federal Law and Regulation – Or Lack Thereof**

There is no federal law requiring enterprise users to provide access to 911 services from behind a multiline telephone system and state laws are on the books in only 17 (or arguably 18) states. Even in the absence of an applicable federal or state statute, enterprises are *not* relieved of liability in the event that access to emergency personnel is restricted or limited in any way.

While there is currently no federal law directly addressing MLTS environments, there are direct and indirect references to 911 access in other pieces of federal legislation that are industry- or technology-specific. The Wireless Communications and Public Safety Act of 1999, The ENHANCE 911 Act of 2004, the FCC’s VoIP Order of 2005, the New and Emerging Technologies 911 Improvement Act of 2008, the FCC’s Notice of Inquiry (NOI) regarding Framework for Next Generation 911 Deployment from late 2010, and most recently Middle Class Tax Relief and Job Creation (or “Jobs”) Act of 2012 all address some issue relating to emergency access and policy. Other pieces of federal
legislation have been introduced but remain in committee, including the Wireless Innovation and Public Safety Act of 2011.\textsuperscript{x}

Other pieces of legislation, including the Higher Education Opportunities Act\textsuperscript{xi}, the Americans with Disabilities Act\textsuperscript{xii} and the Occupational Safety and Health Act of 1970\textsuperscript{xiii} each mandate, albeit indirectly, specific obligations with respect to 911. OSHA, in particular, is absolutely not about 911. It defines an obligation of an employer to provide a safe work environment, not only for employees, but for contractors and guests as well. Given that as much as 10% of the current workforce is made up of contractors, ignorance or disregard of OSHA obligations pose a significant risk to the enterprise.

Specifically, liability under OSHA applies when there has been an intentional disregard of a statutory requirement. While a working E911 system is not a statutory requirement, the creation of an emergency action plan is.\textsuperscript{xiv}

A claim qualifies under OSHA if it meets both prongs of this test:

\begin{enumerate}
\item The injury to an employee is a workplace injury, and
\item As a result of the employer not meeting its obligations (which could be interpreted to mean its obligations to provide a safe workplace with accurate 911 access), the injury is enhanced or exacerbated.
\end{enumerate}

Despite the statutory requirement, even the most inexperienced trial lawyer could argue that an employer without 911 access – or a locally terminated call to an individual not qualified to answer an emergency call – has placed its employees in an unsafe environment. Given that OSHA violations can come with penalties between $7,000 and $70,000 per day per violation, enterprises are advised to consider any and all steps necessary to ensure that those who visit its facilities have at least access to 911 emergency services. This means end users must be able to dial a number and get either an actual 911 dispatcher or someone in-house who can dispatch.

**Workers' Compensation**

Workers' compensation is another way by which employers can be found liable for on-the-job injuries. Damages vary by state, with potential liability for sizable awards. As the number of states with codified 911 obligations has grown in recent years, the strength of workers' compensation-related claims in this arena has been weakened. But the failure to have a functioning 911 system that provides relevant and critical information, particularly when such a system is required by law, could easily be considered a basis for a claim of a knowing and intentional injury to an employee, thus creating additional vulnerabilities for employers that have not taken the necessary steps to at least minimize risk to employees.

Workers' compensation applies to employees only and does not cover contractors, vendors or guests. Additionally, an employee can choose either a workers' compensation or a civil claim, but cannot have access to both potential remedies. Workers' compensation also has a ceiling on the amount that can be paid out to an injured employee. Workers compensation may be a quicker route to settlement, but it has significant limitations.
911-Specific Laws

On the federal front, it is also important to acknowledge that while the FCC is involved in planning and execution regarding 911 capabilities, the Commission’s role with respect to 911 implementation is strictly advisory. Spectrum auctions (the allocation of available radio spectrum as managed by the FCC) certainly require primary action by the FCC, and spectrum allocation has become a hot-button issue lately as regulators wrangle with broadcasters and others over spectrum for emergency use. But from the end user’s perspective, the commission’s role remains as an active participant at the table where such issues are discussed, but without authority to direct, control or enforce.

The question of which agency should take the lead in 911 policy has yet to be resolved. Some argue that such an effort should be directed on the federal level by Department of Homeland Security (DHS), while others believe it should be Federal Emergency Management Administration (FEMA), DoD (Department of Defense) or the FCC. While discussions of this issue may have gone on quietly in the shadows in Washington, this is really not a hot button issue, and is likely to remain so until there is meaningful discussion about direct federal governmental involvement, including enforcement, of 911 regulation.

State Regulations

State regulation of MTLS is where the rubber meets the road with respect to 911 obligations for MLTS providers. To date, 17 states have legislation in their respective codes, and an 18th state (New Hampshire) has cobbled together several disparate sections of code to create obligations for MLTS providers. Rules exist currently in Alaska\(^{xv}\), Arkansas\(^{xvi}\), Colorado\(^{xvii}\), Connecticut\(^{xviii}\), Florida\(^{xx}\), Illinois\(^{xx}\), Kentucky\(^{xoi}\), Louisiana\(^{xoi}\), Maine\(^{xxii}\), Massachusetts\(^{xovi}\), Michigan\(^{xovi}\), Minnesota\(^{xovi}\), Mississippi\(^{xovi}\), Texas\(^{xovi}\), Vermont\(^{xovi}\), Virginia\(^{xovi}\), and Washington\(^{xovi}\). Legislation has been introduced but not yet adopted in Nebraska\(^{xovi}\), Ohio, Pennsylvania\(^{xovi}\), and California\(^{xovi}\).

For those states with legislation on the books, and those considering taking the leap, the guiding path has been established by NENA, the National Emergency Number Association.\(^{xovi}\) Officials from constituencies in the user community were involved in the two-year drafting process leading to the NENA Model Legislation\(^{xovi}\) which has been widely cited and used as a model for legislation in other states. In Virginia, for example, the MLTS rules were modified following the publication of the NENA document, and in Massachusetts, a good deal of the model legislation was used in the Commonwealth’s revised rules.

NENA Model Legislation

The NENA Model Legislation contains some pointed direction regarding location information. Specifically, it recommends that an enterprise facility larger than 7,000 square feet should be able to send more granular information to a PSAP than simply a street address. For example, specific square footage obligations are defined in Illinois. In some states, enterprises that occupy multiple floors of a single building are required or directed to provide identifying information for each of those floors as separate locations, regardless of square footage.
Florida

Several interesting state rules are worth highlighting. The obligations in Florida, which are defined in Section 365.175(2) of the Florida Statutes (Public Switch Automatic Location Informationxxxvii) require very careful attention:

365.175(2) REQUIRED ALI CAPABILITY.—Each PBX system installed after January 1, 2004, must be capable of providing automatic location identification to the station level.

Note the statute says that the system must be capable of providing location information, but it does not say that such capability must be active. As such, this is an obligation for the providers of PBX equipment, and not necessarily enterprises. But even a relatively unskilled attorney could make an argument that since the employer purchased devices that were capable of providing such information, its decision not to activate such capabilities constituted either negligence or negligence per se. The statute’s requirements verge on placing an all-out obligation on the enterprise, but fall just shy of actually doing so.

Illinois

In Illinois, Section 50 ILCS 750/15.6 of the Emergency Telephone System Actxxxviii makes a distinction between businesses with 40,000 square feet of workspace or less and those with more. Specifically,

For buildings having their own street address and containing workspace of 40,000 square feet or less, location identification shall include the building’s street address. For buildings having their own street address and containing workspace of more than 40,000 square feet, location identification shall include the building’s street address and one distinct location identification per 40,000 square feet of workspace. Separate buildings containing workspace of 40,000 square feet or less having a common public street address shall have a distinct location identification for each building in addition to the street address.

(b) Exemptions. Buildings containing workspace of more than 40,000 square feet are exempt from the multiple location identification requirements of subsection (a) if the building maintains, at all times, alternative and adequate means of signaling and responding to emergencies, including a telephone system that provides the location of a 911 call coming from within the building, and the building is serviced by its own medical, fire and security personnel. Buildings under this exemption are subject to emergency phone system certification by the Illinois Commerce Commission.

The Illinois language is unique in its 40,000 square foot threshold and its exemption for facilities that are serviced by their own medical, fire and security personnel.
**Michigan**

The Michigan law\(^{xxxix}\), which was largely drafted during the summer of 2011, contains some interesting provisions. It requires that an MLTS system provide specific location information associated with each communication device, floor and street address (including one identifying number for every 7,000 square feet). In addition, it sets various square footage parameters with specific location requirements depending on whether the entity has a single street address or multiple addresses and whether it occupies a single floor or multiple floors.

Perhaps most interestingly, penalties for failure to comply range between $500 and $5,000 per offense. These fines were not intended to be punitive, but to encourage compliance, since the cost of the fines is (at least for now) comparable to the cost of implementing an effective and compliant 911 system.

Michigan’s new MTLS legislation\(^{xl}\) was set to become effective on Dec. 31, 2011. However, in late December 2011, the Michigan Legislature extended enforcement of the new rules for five years. Thus entities using MLTS systems have a five-year extension to comply with new state regulation before the state will begin to enforce its new rules. The language of the statute is vague, but it does require “each service user with a multiline telephone system to install no later than December 31, 2016 the necessary equipment and software to provide specific location information of a 9-1-1 call.”\(^{xli}\) How specific the location needs to be has not yet been defined.

**New Hampshire**

New Hampshire is the latest state to take a stand regarding 911 obligations behind an MLTS. But rather than draft new legislation, the state’s public safety arm was the first to cobble together pieces of statutory language from a variety of sources in order to arrive at what it believes to be regulations sufficient to impose obligations on enterprises located within the state.

Under New Hampshire Revised Statues Annotated 378:17-c,\

> Nonpublic utility providers of telephone services using a PBX switch or similar equipment shall be considered telephone utilities for purposes of RSA 106-H:8. Nonpublic utility providers of telephone services shall comply with the telephone utility requirements of RSA 106-H:8 no later than January 1, 2007.\(^2\)

Secondly, New Hampshire’s RSA 106:H-8 reads

> Each telephone service provider shall assure that all requests for police, fire, medical, or other emergency services received by the provider or the provider’s operator services shall be transferred to the public safety answering point. Such transfer shall include the calling party’s telephone number in American Standard Code for Information Interchange (ASCII) in a format recommended for data exchange by the National Emergency Number Association (NENA).
Some locations, most notably counties within the State of Texas, may have their own rules regarding essential location information to be provided that goes beyond what the state statutes require. Contact your local first responders with questions about the granularity of location information that must be reported to PSAPs in your area, as they are in the best position to monitor and advise enterprise users about specific local obligations.

If an enterprise has facilities in different states, some of which have MLTS rules and others which do not, the enterprise will be held to the standard of state where the most stringent standards apply where it also has employees. Otherwise, the employer can be deemed to have treated similarly situated employees differently.

**Case Law**

While there have been several suits filed as a result of enhanced injury or death as a result of delays in getting first responders to someone in need in a timely manner, all cases to date have been settled. As such, there is no record available on the amounts of settlement. However, it can be inferred that prior to settlement, which will likely have been for a substantial amount, thousands of dollars in legal fees will have been spent to reach a private outcome (if not more).

**911 RFPs and Implementation**

Planning for a 911 implementation is a complex process involving input from both internal and external sources. While 911 projects often are tacked on to an issue “owned” by a single department, successful implementations require active participation from a number of internal sources. These include (in no particular order) public safety, human resources, facilities, legal, telecommunications/IT and risk management. Other entities may find that other departments should be included as well, but for a sizable organization, the perspective that each of these departments brings to the table is critical to minimize inadvertent missteps.

There are critical parties outside the enterprise that should be consulted as well, and this is best done before a 911-related RFP is distributed to potential vendors. Representatives from local police, fire and ambulance crews should be included in the discussion. Input from the first responders can often save time, money and aggravation. By knowing what type of information first responders will find most helpful, enterprises can cut through much of the hype of 911 products while still doing everything reasonable to protect the work force, guests and independent contractors on premise.

Specifically from a telecommunications/IT perspective, when an RFP or RFI is prepared for new equipment and/or services, 911 capabilities may be inadvertently left out. Generally this exclusion is not because 911 is not important, but rather because it is not in the forefront of a network manager’s mind when he or she begins to contemplate increased system functionality and capabilities. There are many elements of a new system or configuration that may be taken for granted, but 911 capability is particularly important because it often comes with an additional and significant cost. No manager likes to be surprised with an extra line item after the deal has been struck—particularly for an item that could be considered essential.
Further, rules like those currently on the books in Florida require that systems be 911 capable. But capability without activation (where appropriate) could be viewed as reckless if calls to 911 do not connect within the first responders' window of opportunity.

A potential sticking point for enterprise RFP discussions is the topic of location granularity. If the transmitted information contains specific cube or office location identifying information, such information is only valuable if the dispatcher can translate it into something meaningful. A floor plan location that indicates the caller is in Cube 3-2c is no more useful than suggesting that the person who made the call is wearing red suspenders. Providing location-specific information is only beneficial if the information is readily understood. Based on a variety of available options and capabilities, location information can be provided to the station, zone or building level. But before making the investment, enterprise users should find out what information will be most useful to those who will be entering the facility when time is of the essence.

This reinforces the need for communication with the first responders during the planning process. Providing information is one thing, but providing relevant information in a limited number of available characters is something else. It is the ultimate exercise in efficiency.

**A Word About Testing**

Investing in 911 capabilities is only part of the equation. The system should be tested, with prior notification to first responders, annually. The 911 system is similar to the in-house defibrillators and fire extinguishers: while you hope they will never be needed, routine tests are required to identify and fix glitches.

**Conclusion**

The 911 infrastructure has provided many people with life-sustaining and saving response to medical and other emergencies. As technology becomes increasingly sophisticated and as those who work behind multiline telephone systems and/or who use IP telephony to support office functions become more numerous, it is in the employer's best interest to look to improve the way its employees, contractors and guests can reach out to first responders should the need arise.

Managing access to 911 is not a one-time task, but a systematic and ongoing effort and a collaboration of parties both within the enterprise and on the outside. These individuals, each of whom provide important and relevant expertise and perspective, together can take steps to ensure that a workplace has ready access to emergency personnel.

Because it is impossible to know whether the 911 capability will ever be required, there is literally no measurable payback for such capability. In this way, additional 911 features are like a security system—there is no way to measure how much was saved by the investment of time, money and effort that goes into designing it properly. But the downside of not being able to support useful and relevant 911 information can be catastrophic.
About the Author, Martha Buyer
Martha Buyer is an attorney whose practice is primarily focused on telecommunications law. She has negotiated a broad array of agreements between providers and both corporate and government end users, while also providing telecommunications consulting and legal services. In addition, she works extensively to assist end users navigate international, federal, state and local regulation, with particular attention to emergency calling. Prior to becoming an attorney, Ms. Buyer worked as a network engineer.

Since 2005, Ms. Buyer has been the regulatory counsel for the Society of Telecommunications Consultants, Inc., an organization of independent consultants who adhere to a rigorous code of ethics (www.stcconsultants.org). She is admitted to practice in New York, Colorado, Wisconsin, and Massachusetts.

You can contact Martha at martha@marthabuyer.com. Learn more about her practice at www.marthabuyer.com.

About 911 ETC
911 ETC provides individual E911 solutions while addressing mandated E911 statutes throughout the United States. Its hosted platform makes the E911 application affordable for any sized organization, is compatible with PBX and VoIP, and provides automatic, ongoing maintenance and upload of the E911 database. 911 ETC’s service is easily scaled and available for multi-site enterprise on down to the smallest of office suites. Founded in 1997, the company is now a leading national E911 provider with hundreds of customer sites across nearly all 50 states and Canada. Learn more at www.911etc.com.

About CCMI
CCMI is the industry’s leading provider of telecom rate and data solutions and information. We are dedicated to delivering relevant, highly specialized and strategically focused content. Find a complete product listing at http://www.ccmi.com/Products. CCMI publishes Voice Report, the leading independent source of telecom news, analysis and award-winning guidance on communications technology services and equipment for the enterprise. For analysis and guidance on the latest telecom happenings, visit http://www.TheVoiceReport.com, and sign up to receive email updates.
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http://www.nena.org/?page=911Statistics
http://www.buffalonews.com/incoming/article27356.ece


PUBLIC LAW 106–81—Oct. 26, 1999. The act directed the FCC to make 911 the universal emergency number for both wireline and wireless telephone service. It directed the FCC to encourage states to develop “comprehensive emergency communications throughout the U.S.

PUBLIC LAW 108–494 – Dec. 23, 2004 Ensuring Needed Help Arrives Near Callers Employing 911 Act of 2004. This legislation was intended to speed E-911 implementation and improve coordination among all levels of government, by providing seed money to promote best practices and technology innovations, while also providing funding to assure that PSAPs are can implement sophisticated equipment.


PUBLIC LAW 110–283, July 23, 2008. Most importantly, this act requires IP-enabled voice service providers to provide 911 access (including Enhanced 911 capabilities) to their subscribers.


PUBLIC LAW 112–96—Feb. 22, 2012. Broadly, the JOBS Act of 2012 provided two major enhancements to 911 policy—it reallocates the 700 MHz D block of spectrum to public safety and authorizes the FCC to conduct incentive auctions to raise $7 billion to pay for a NATIONWIDE public safety network.

H.R. 3509, http://www.govtrack.us/congress/bills/112/hr3509/text


29 CFR 1910.38(a). An emergency action plan must be in writing, kept in the workplace, and available to employees for review.

However, an employer with 10 or fewer employees may communicate the plan orally to employees.

https://rca.alaska.gov/RCAWeb/ViewFile.aspx?id=0EC16509

http://www.lexisnexis.com/hottopics/colorado/

http://www.ilga.com/commission/jcar/admircode/083/08300726sections.html
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