

Public Notice
Kari's Law Workshop and Request for Comments

Tuesday, September 15, 2015, 1:00 p.m. to 5:00 p.m.

William P. Hobby Building
333 Guadalupe Street, Room 100
Austin, Texas 78701

Staff of the Commission on State Emergency Communications ("CSEC") will conduct a workshop in advance of initiating rulemaking to implement new Health and Safety Code Chapter 771A, Access to Emergency Communications In General ("Kari's Law") on Tuesday, September 15, 2015, from 1:00 p.m. to 5:00 p.m., in the William P. Hobby Building, 333 Guadalupe Street, Room 100, Austin, Texas 78701. The purpose of the workshop is to obtain information and recommendations regarding implementing Kari's Law, with specific focus on (1) Telephone systems including Multi-Line Telephone Systems (MLTS); and (2) On-Site Notification requirements.

The workshop begins the process of implementing Texas' recently passed Kari's Law. Kari's Law authorizes CSEC and Emergency Communication Districts to adopt rules to implement Kari's Law. The purpose of the workshop will be to identify and determine how CSEC should implement the requirements of Kari's Law for the state 9-1-1 program area.

All 9-1-1 Entities, MLTS operators, vendors, or users, businesses (including hotels, hospitals, schools), communications service providers, third party provider community, and interested persons are invited to submit comments and attend this public workshop.

For more information see the Kari's Law page on the CSEC website at <http://www.csec.texas.gov/9-1-1/mlts#workshops>.

Workshop Materials: [Public Notice of Kari's Law Workshop and Request for Comments \(Posted in the August 21, 2015 Issue of the Texas Register \(34 Texreg.\)](#)

Questions for Comment – Pages 2-3 of this document

Audio Broadcast: A live audio broadcast of the workshop will be available. Questions will be accepted via the texting option of the online webinar broadcast. After registering at the link below, you will receive a confirmation email containing information about joining the webinar.

<https://attendee.gotowebinar.com/register/6573083189468514562>

Please note that registration to the audio bridge is a one-way audio-only broadcast of the workshop.

KARI'S LAW WORKSHOP QUESTIONS FOR COMMENT:

In preparation for the workshop, staff requests comments from interested parties in response to the questions listed below. Please submit written replies to the requests for comment electronically to Robert Gonzalez at robert.gonzalez@csec.texas.us, by mail to CSEC at 333 Guadalupe Street, Suite 2-212, Austin, Texas 78701-3942, or by fax to (512) 305-6937. Please include "**Comments for Kari's Law Workshop**" in the subject line of your filing. Please limit comments to 10 pages.

REQUESTS FOR COMMENT

1. Respondent information

So that CSEC may better understand comments, please identify who you are or represent:

- a) MLTS Operator;
- b) MLTS Manager;
- c) MLTS Equipment/Software Provider;
- d) MLTS End-user; and/or
- e) Other Interested Party _____,
- f) General Public

2. Kari's Law Implementation Questions

- a) Kari's Law is specifically applicable to a "business service user" which is defined in the law as someone that "provides telecommunications service, including 9-1-1 service, to end users through a publicly or privately owned telephone switch." Kari's Law is also specifically applicable to an equivalent system that uses Internet Protocol ("IP") enabled service (e.g., VoIP). CSEC interprets business service user to mean a person or entity (including local, regional, and state governmental entities) that provides residential or business voice service through a telephone system or an equivalent IP-enabled system. Do you agree with this definition? If not, please explain.
- b) The law requires on-site notification of a 9-1-1 call sent to a central location on the site of the residential or business facility from which the call is made. Does the law allow on-site notification to be sent to a designated location within the residential or business facility complex that is manned 24x7 by personnel able to assist emergency responders? For example, could on-site notification be sent to campus police rather than to the facility from which the 9-1-1 call originated?
- c) Are all MLTSs configurable to provide onsite notifications without requiring improvements to the systems' hardware? Please provide detail as to why or why not.

- d) Describe the process for implementing on-site notifications, including the configuring of an MLTS to provide such notifications.
- e) Must a business service user request a waiver if its MLTS cannot provide on-site notification without improving the system's hardware?
- f) Should CSEC establish by rule the content and form of the instructional sticker to be placed adjacent to noncompliant telephones?

3. Other Comments or Questions for CSEC Consideration

Please provide any additional comments or questions you would like CSEC to consider at the workshop.