

TEXAS COMMISSION ON STATE EMERGENCY COMMUNICATIONS
Austin, Texas

In the matter of

PUBLIC NOTICE OF WORKSHOP AND)
REQUEST FOR COMMENTS:)
)
ACCESSING 9-1-1 SERVICE VIA A)
MULTI-LINE TELEPHONE SYSTEM)

COMMENTS OF CONVEYANT SYSTEMS, INC.

CONVEYANT SYSTEMS, Inc. respectfully submits the following in response to the Commission's Request for Comments in the above-referenced proceeding¹.

COMMENTS

In December of 2013, a young mother of two, Kari Hunt, was murdered at a hotel in Marshall, Texas in front of her children. As her estranged husband savagely attacked her, her young daughter tried four times to place calls to 911 from the hotel room desperately looking for help. Because, even with good intentions, the hotel had set up its phone system to require that a "9" be dialed before the North American standard "9-1-1," none of Ms. Hunt's daughter's calls ever completed. Whether a successful call to 9-1-1 would have been sufficient to save her life is unknown. What is known, however, is that despite the best efforts of teachers and others who had spent time instructing children about what to do in an emergency, the system failed. It is for this reason that Conveyant Systems, Inc. believes that it is critical to encourage the Texas Commission

¹ CSEC *Accessing 9-1-1 Service Via a Multi-line Telephone System*, (Last visited July 20, 2014), <http://www.csec.texas.gov/accessing-9-1-1-service-via-a-multi-line-telephone-system>

on State Emergency Communications, in the strongest possible terms, to take action to resolve this existing problem.

Conveyant Systems is pleased to offer its input to the Commission on the creation and enforcement of E9-1-1 functionality requirements for MLTS systems that would address this problem.

As any first responder will be quick to volunteer, when seconds count, knowing a caller's location is absolutely essential. To date, there is no federal regulation--or even guidance--regarding location information for phones placed behind an MLTS. Further, only 18 states have taken any action at all to define requirements. State-imposed requirements and obligations vary significantly from state to state. In fact, where it exists at all, it has been largely ineffective in securing – let alone enforcing – remediation and compliance. To date (August, 2014), only 18 states have MLTS legislation in place, and with the exception of Michigan², there is a glaring absence of penalties for non-compliance, minimizing *any* incentive for MLTS managers or operators to implement corrective actions.

The inconsistencies among and between state rules presents a significant challenge to MLTS operators and managers as they do their best to comply with a patchwork of state – or locally--driven regulations across corporate networks that span multiple jurisdictions.

² Michigan Public Service Commission, *Order and Notice of Hearing*, Exhibit A, Page 3, R 484.906 Penalties, http://www.dleg.state.mi.us/mpsc/orders/comm/2011/u-16439_02-25-2011.pdf

It is Conveyant's position that state agencies are in the best position to advance legislation based upon existing guidance that is aligned with accepted best practices as published by organizations such as the National Emergency Number Association (NENA)³, the Association for Public Safety Communications Officials (APCO)⁴ and even agencies abroad such as the European Emergency Number Association (EENA)⁵.

1. Respondent information

Conveyant Systems, Inc. is the industry-leading supplier of PC-based operator consoles and E9-1-1 Emergency Location Management Solutions for PBX, VoIP and Centrex applications. Conveyant's software interfaces with telecommunications and data networks to provide feature-rich solutions for a wide array of enterprises, including, but not limited to the hospitality industry.

2. Multi-line Telephone System (MLTS) Awareness and Action

a. Awareness of issues

Because time in an emergency is often so critical, there is obvious concern that requiring an extra digit to be dialed as an access number before an emergency call can be successfully completed places an extra burden not only on the caller, but on the recipient of the call as well. We train even the youngest members of our society to respond an emergency by dialing 911. The necessity of dialing an extra digit causes

³ NENA website, <http://nena.org>

⁴ APCO International website, <http://apcointl.org>

⁵ EENA website, <http://eena.org>

confusion and adds delays, especially when the dialer is stressed by the precipitating emergency event.

b. *Awareness of efforts*

Conveyant Systems Inc. has been actively supporting the efforts nationwide to correct this problem by providing support to local political organizations as well as supporting the efforts of Hank Hunt in raising awareness of Kari's Law on the change.org website.

c. *Supportive information*

CSEC can act to see that the barrier to direct 911 access is removed immediately. We believe that the steps to make this happen are easy and inexpensive and should be done as quickly as possible. It is Conveyant's position that the lack of awareness of the problem of direct-dial 9-1-1 compliance, coupled with disparate and incomplete legislative directives, prevents MLTS operators and managers from implementing meaningful remediation measures.

d. *Should Texas wait for an FCC timeline?*

No. Conveyant's position is that the CSEC should do whatever it can to encourage implementation of these basic concerns. An issue of this magnitude which is easy to remedy should be handled at the state and local levels where it can be addressed and implemented more quickly than if it becomes national. In the event that national regulations become more stringent, or offer different possibilities than what CSEC puts in place, CSEC will retain the right to make modifications accordingly.

e. *Does CSEC have the authority to adopt rulemaking?*

It is the position of Conveyant Systems Inc. that the CSEC has the authority to remove any existing barriers to immediate access to public safety officials.

3. MLTS Programming:

a. *Are MLTS programmable ?*

It is the belief of Conveyant Systems, Inc. that most, if not all, MLTSs have the capability to define dialing codes to restrict—or not restrict—any dialing practices that the owner/operator chooses to use.

b. *Describe the process for MLTS reprogramming*

The process for reprogramming any MLTS is defined by the specific vendor and product.

c. *What costs, if any, are associated with reprogramming an MLTS to allow for direct 9-1-1 dialing? Please provide specific, known, and quantifiable costs for MLTS revisions.*

It is the opinion of Conveyant Systems that there should be no costs associated with reprogramming an existing MLTS to accommodate these critical issues of access to first responders.

4. MLTS Services/Capabilities

N/A

5. Awareness, Education, Responsibilities

a. *How can awareness and education contribute?*

The responsibility to educate all market participants (service and equipment providers, other vendors, customers and guests) to ensure the accessibility of 911 from an extension located behind an MLTS must be incumbent on everyone. This is not simply the responsibility of the entity deploying an MLTS solution.

b. *Who are the responsible parties?*

The MLTS provider, the entity purchasing, managing and operating the MLTS device(s), and the underlying carrier used to provide connectivity between the MLTS and the PSAP all share responsibility. Each has its own areas of expertise and each must take responsibility for ensuring connectivity leading to access.

c. *Implementing an MLTS frequently involves the interaction of multiple parties. What are, or should be, the responsibilities of each of the following: 1) communications service provider; 2) MLTS Hardware/Software vendor; 3) MLTS Operator; and 4) MLTS Manager.*

1) Communications service providers should be required to ensure that all listed numbers that the end-user uses for 911 purposes are properly included in the ALI or PS-ALI database. In addition, all outgoing trunks from the MLTS must be capable of sending complete and appropriate ANI from the point of origination all the way through to the PSAP.

2) MLTS hardware/software vendors should provide options for complete programming of the MLTS to allow access to 911 without the need for a caller to dial any specific prefix or access code. In addition, these vendors must also provide detailed

information regarding on-site notification capabilities (where applicable) to alert trained, appropriate personnel that a 911 call is in progress, with details about the device being used to originate the emergency call.

3) MLTS operators should insure that all phones have the ability to dial 911 without interference or required additional digits. Further, the operator should be required to not only deliver calls, containing complete information, to the carrier network for proper delivery to the local PSAP servicing that location, but should perform routine testing with the local PSAP to verify proper system operation.

4) MLTS managers should ensure that all information contained in the MLTS is maintained at all times, with particular attention to accurate location information. MLTS managers must also plan and implement regularly scheduled audits and testing of emergency calling processes along with proper training for all on-site personnel.

CONCLUSION

Conveyant Systems, Inc. couldn't be more passionate in its support of the CSEC as it seeks to adopt legislation requiring access to 9-1-1, both with and without an access code, on-site alerting or notification when a 9-1-1 call is placed, and the direct termination, without interception or interference of the call--to the designated 9-1-1 center serving that facility. We believe that until the Federal Communications Commission and other interested parties force federal compliance obligations, the CSEC

is in the best possible place to enforce what seems to be common sense. Nothing will bring Kari Hunt back. But perhaps enactment of this law can be her legacy which can save others in her stead.

Respectfully submitted,
CONVEYANT SYSTEMS, INC.

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