Multi-Line Telephone System Rules

Frequently Asked Questions

1. Who should I contact regarding specific questions on the Multi-Line Telephone System (MLTS) Rules?
   - The following questions and answers provide a general overview of the MLTS Rules. Questions regarding your specific multi-line telephone system solution should be directed to your MLTS service provider. Questions regarding your legal obligations under these rules should be directed to your legal counsel. For any additional questions, please contact the State 911 Office at mspetsc@michigan.gov.

2. What is a MLTS?
   - Multi-line telephone system is defined in Rule 2 of the MLTS Rules. "'Multi-line telephone system' or 'MLTS' means a system comprised of common control unit or units, telephone sets with unique telephone numbers, and control hardware and software."
   - Communications device is also defined and used throughout the rule set. 'Communications device' means a device capable of accessing, connecting with or interfacing with a 9-1-1 system, exclusively through the numerals 9-1-1, by dialing, initializing, or otherwise activating the 9-1-1 system through the numerals 9-1-1 by means of a local telephone, cellular telephone, wireless communications device, interconnected voice over the internet device, or any other means."
   - Section 405 of the Michigan's Emergency 9-1-1 Service Enabling Act (911 Act) requires that the rules apply to a MLTS regardless of the system technology. Multi-line telephone systems can be comprised of VoIP, as well as network and premises-based systems such as Centrex, PBX, and hybrid key telephone systems. The 911 Act can be found in full at: http://www.legislature.mi.gov/documents/mcl/pdf/mcl-act-32-of-1986.pdf.
   - Multi-line telephone systems are frequently used by institutions and businesses such as: government agencies, banks, hotels, health care systems, and schools.

3. What are MLTS Rules?
   - The Multi-line Telephone System Rules were promulgated in October 2011. Its purpose is to ensure that first responders receive the specific location of the caller, as defined in the MLTS Rules, when responding to 911 calls for emergency services from a Multi-line Telephone System. Section 405 of the 911 Act currently mandates a December 31, 2019, compliance date.

4. Where can I find further information on the MLTS Rules?
   - Information on the rules can be found here:

Updated 07/18/18 with Karl’s Law
SNC approved 06/14/17
Information was also sent by the State 911 Committee to directly to a number of organizations which represent industry segments including, but not limited to, hospitals, businesses, local governments, schools and manufacturers.

5. When do the Rules go into effect?

- The rules, enacted in October 2011, were initially set to become effective on December 31, 2011, pursuant to the 911 Act. However the 911 Act was amended in December 2011, and subsequently in June 2016, to extend the deadline for compliance to December 31, 2019.

6. How are certain locations, such as state hospitals, to be handled where support staff management doesn’t want patient rooms to have the ability to call 911 directly?

- While Rule 4 of the Michigan MLTS Rules allow for certain exemptions, there are requirements under a federal statute known as Kari’s Law requiring that “a user may directly initiate a call to 9-1-1 from any station equipped with dialing facilities…. If MLTS operators intend to utilize the exemptions, there is still the requirement to ensure that the specified federal requirements are met. MLTS operators may also find additional information on exemptions in the MLTS Guidelines.

- The MLTS operator should seek the advice of legal counsel when making MLTS system decisions that impact users' access to 911 in order to meet both state and federal requirements.

7. How does a wireless environment meet the location requirements under the law?

- Rule 1 of the MLTS Rules provides: “These rules apply to multi-line telephone system operators as defined in Part 1, Rule 2 of these rules.” ‘Multi-Line Telephone System' or 'MLTS' means: a system comprised of common control unit or units, telephone sets with unique telephone numbers, and control hardware and software.

- Specific location is also defined in the rules: “‘Specific location' means a room or unit number, or room name, or equivalent unique designation of a portion of a structure or building to which a 9-1-1 emergency response team may be dispatched, and the caller quickly located, that is not more than 7,000 square feet.”

8. The MLTS Guidelines say that local public-safety entities “can provide specific guidance as to what level of information would be sufficient for compliance.” Does that mean there’s a statewide set of specific guidelines that local entities are responsible for sharing or does it mean the rules will be interpreted and enforced differently by different local agencies?

- Rule 3(1) states that “The MLTS operator shall assure that the multi-line telephone system is capable of routing 9-1-1 calls to the 9-1-1 network, and answered by a primary PSAP, in a manner that the calls result in accurate Automatic Location Identification (ALI) and Automatic Number Identification (ANI) that can be verified in the 9-1-1 location database and include the specific location of the communications device.” MLTS operators may contact their local public safety answering point (PSAP) to see if the specific location information is being displayed as required by the rules.

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1 A full version of the federal statute can be found at https://www.congress.gov/115/bills/hr582/BILLS-115hr582enr.xml.
9. Are all spaces within a building supposed to count toward the 7,000 square foot threshold? For example, if a community center has a building that's 10,000 square feet in total usable space but 4,000 of that is indoor tennis courts where there are no phones, does the building fall under the rules?

   o The 7,000 square foot threshold only applies to occupied space. The term "occupied" is not defined in the rules. If the indoor tennis courts are considered to be an occupied space, the rules apply. If the tennis courts are considered to be an unoccupied space, the rules do not apply.

10. Are waivers available for businesses that find it can’t implement the rules in an economically feasible manner?

   o There is no language in the rules allowing for such waivers.

   o Per Rule 5 of the MLTS Rules: MLTS operators in violation of the act after December 31, 2019, must provide the commission and the committee information on the failure to meet the deadline and within 60 days of the violation, provide a plan to remedy the failure within 6 months.

11. How does the PSAP know when a system isn’t in compliance without asking for the current location?

   o Per Rule 5 of the MLTS Rules, it is the MLTS Operator’s responsibility to notify in the event of noncompliance.

   o Working with your local public-safety entities is critical because those entities may provide the Public Service Commission and the State 911 Committee with notification of a MLTS operator’s non-compliance with the MLTS Rules.

12. For customers attempting to describe an Emergency Response Location (ERL) that may be larger or non-conforming, can the utilization of zones accomplish this? If so, are there pre-defined guidelines on what makes up an acceptable zone (i.e. 1000 square feet without enclosed partitions)?

   o The definition of specific location sets forth what constitutes compliance with the specific location requirements. "Specific location" means a room or unit number, or room name, or equivalent unique designation of a portion of a structure or building to which a 9-1-1 emergency response team may be dispatched, and the caller quickly located, that is not more than 7,000 square feet.

13. Some users may use a hosted device such as a conference phone that has an associated telephone number that can dial E911 when plugged into an active Ethernet jack. What type of E911 requirements apply if the phone is used as a portable device, moving from one conference room to another as needed? (Only one ALI/ERL can be applied to the telephone number associated to the device.)

   o See definition of communications device in the MLTS rules. "Communications device" means a device capable of accessing, connecting with or interfacing with a 9-1-1 system, exclusively through the numerals 9-1-1, by dialing, initializing, or otherwise activating the 9-1-1 system through the numerals 9-1-1 by means of a local telephone, cellular telephone, wireless communications device, interconnected voice over the internet device, or any other means.
14. What E911 requirements apply to users who share the same telephone number over multiple telephones (shared use), possibly in different locations throughout the building(s)?

- See the specific location definition. “Specific location” means a room or unit number, or room name, or equivalent unique designation of a portion of a structure or building to which a 9-1-1 emergency response team may be dispatched, and the caller quickly located, that is not more than 7,000 square feet.

- See also Rule 3(1). MLTS operators should also review the terms for MLTS service contained in the contract with the MLTS provider and consult with that provider for further information.

15. What resources has the State made available to communicate or educate businesses on the new MLTS requirements?

- The State 911 Committee, in cooperation with the State 911 Administrator’s Office, have developed Guidelines for assisting with the MLTS Rules. The State 911 Office, through the Michigan State Police, has also issued a Press Release and endeavored to provide notice to businesses and organizations, including those within the hospitality, educational, and medical industries.

16. What if the service provider does not have staff on-site to monitor or perform the business operations and device migrations that use of MLTS technologies enables?

- Rule 1 of the MLTS rules specifies that these rules apply to multi-line telephone system operators as defined in Rule 2 of these rules. Rule 3(1) states that “The MLTS operator shall assure that the multi-line telephone system is capable of routing 9-1-1 calls to the 9-1-1 network, and answered by a primary PSAP, in a manner that the calls result in accurate ALI and ANI that can be verified in the 9-1-1 location database and include the specific location of the communications device.” MLTS operators may contact the local PSAP to see if the specific location information is being displayed as required by the rules. The rules do not contain any language related to issues arising between MLTS Operators and service providers which relate to the operation of the Multi-Line Telephone System regardless of technological solution implemented. Accordingly, additional issues that arise regarding any contractual arrangements should be addressed by the parties and their legal counsel.

17. Do these rules impact provider responsibilities for remitting 911 surcharge monies?

- These rules do not affect 911 service providers’ statutory liabilities for collection and remittance of 911 surcharge monies.

18. What if my organization has a MLTS that qualifies but does not wish to comply with the MLTS Rules?

- Rule 6 of the MLTS Rules states that MLTS operators in violation of the act after December 31, 2019, may be assessed a fine by the Public Service Commission from $500.00 to $5,000.00 per offense.
19. How will penalties be determined if MLTS operators do not comply with the MLTS Rules?

   o The penalties outlined in Rule 6 of the MLTS Rules will be determined on a case-by-case basis as they are brought before the commission for review.

20. What if my organization cannot comply with the MLTS rules by the December 31, 2019 deadline?

   o Rule 5 of the MLTS rules requires MLTS operators in violation of the Act after December 31, 2019 to provide both the Public Service Commission and the State 911 Committee information on the failure to meet the deadline and within 60 days of the violation provide a plan to remedy the failure within 6 months. These notifications must be sent in writing to both the State 911 Committee through the Michigan State Police as well as the Michigan Public Service Commission at the following addresses:

   Michigan State Police          Executive Secretary
   State 911 Administrator        Michigan Public Service Commission
   PO Box 30634                   and                 P.O. Box 30221
   Lansing, MI 48909             Lansing, MI 48909

21. What information does a MLTS operator need to include in the notification letter to the Michigan State Police and Michigan Public Service Commission?

   o Minimally, the name of the MLTS operator and contact information for the person in the business or organization responsible for MLTS compliance, the reason for non-compliance, identification of the full addresses(s) the non-compliant MLTS is in, and the estimated date that compliance is expected.

22. Does an owner with multiple locations need to submit a separate letter for each location, or can one letter noting the address of all locations be provided?

   o A separate letter is not required, however the letter should identify any separate multi-line telephone systems, and include the information associated with each system as listed in question 22 above. (For example, a bank with regional offices in different parts of the state that has various branches within each region would be listed with the addresses of the branches affected.)

23. How will MLTS operators’ compliance with the rules be reviewed?

   o MLTS operators’ compliance will reviewed on a case-by-case basis. Reporting methods may vary. Businesses unable to comply by the December 31, 2019, deadline are required to report the violation per Rule 5. However, PSAPs may also communicate non-compliance to the Michigan Public Service Commission and the State 911 Committee. Further information can also be found in the MLTS Guidelines.