



**RICK SNYDER**  
GOVERNOR

State of Michigan  
**STATE 911 COMMITTEE**  
LANSING

**JEFF TROYER**  
CHAIR

June 16, 2017

Dear Michigan Legislators:

Please accept this letter on behalf of the 911 community in Michigan as represented by the collective membership of the State 911 Committee (SNC). As the body established by Michigan's 911 enabling legislation, Public Act (P.A.) 32 of 1986 (as amended), we are tasked with promoting the successful development, implementation, and operation of 911 systems and programs in Michigan.

A recently proposed bill, SB 314, will eliminate the Michigan Public Service Commission's (MPSC) authority over multi-line telephone system (MLTS). The SNC does not support this bill and believes that it not only pushes back the progress in 911 accessibility in Michigan, but it puts the users of a MLTS at a potential risk in the event of an emergency in a facility with multiple lines.

As a quick background on this issue, when 911 is dialed from a MLTS line that has not been updated, the call routes to a 911 center. However, the main switch of the MLTS phone system is the location that will display on the 911 operator's screen, and not the caller's exact location. This can take several different forms in its impact at the 911 center.

One type of a MLTS scenario is when a caller in a large multi-floor office building with many small offices on each floor, initiates a 911 call from office 36 on the 27th floor of 232 Main Street. Without a MLTS 911 system, the call will display at the 911 center as 232 Main Street, with no indication as to the office number or the floor number.

A second 911 scenario for a MLTS is a single switch that serves a main office as well as multiple branch or satellite offices. When 911 is initiated from one of the satellite locations, the main switch location information may display at the 911 center and not the actual location of the call. An example of this can occur if a bank teller at a branch office located at 567 Oak Street calls 911 to report an armed robbery, but the display at the 911 center indicates the call is from the main bank branch in the same city at 929 Pine Street.

A very brief history for MLTS 911 in Michigan, in 2006 the State 911 Committee was required through P.A. 249 of 2006 to provide the Michigan Legislature with a report on recommendations for 911 funding and dispatcher training. The SNC, in addition to those recommendations, also took the opportunity in its P.A. 249 Report<sup>1</sup> to include several other recommendations it believed were vital to a strong 911 system

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<sup>1</sup> The P.A. 249 of 2006 Report can be found in its entirety at:  
[http://www.michigan.gov/documents/msp/PA249\\_of\\_2006\\_178037\\_7.pdf](http://www.michigan.gov/documents/msp/PA249_of_2006_178037_7.pdf)

Association of Public Safety Communications Officials • Commercial Mobile Radio Service • Department of Labor and Economic Growth  
Department of State Police • Deputy Sheriff's Association • Fraternal Order of Police • Michigan Association of Ambulance Services  
Michigan Association of Chiefs of Police • Michigan Association of Counties • Michigan Communications Directors Association  
Michigan Association of Fire Chiefs • Michigan Professional Firefighters Union • Michigan Public Service Commission • Michigan Sheriff's Association Michigan State  
Police Troopers Association • National Emergency Number Association • Telecommunications Association of Michigan • Upper Peninsula Emergency Medical Services •  
Members of the general public appointed by the Governor, Speaker of the House, and Majority Leader of the Senate

for Michigan. One of those recommendations was to institute a dispatchable location on multi-line telephone systems. In its report, legislation was recommended by the SNC to the Legislature for MLTS 911 with requirements including square footage and a ten-year implementation deadline. Rather than putting it in a statute in 2007, the Michigan Legislature gave the MPSC the rulemaking authority, based on recommendations from the SNC, over MLTS. The deadline in the statute was 2011<sup>2</sup>. The MPSC met that deadline<sup>3</sup> and the MLTS-owner community (i.e. businesses, manufacturing, education, and hospitality) asked the Legislature for a statutory extension, and P.A. 271 of 2011 extended that deadline to the end 2016.

Over the years, the SNC worked to develop guidelines and provide widespread information to the MLTS community about the rules. During that time, MLTS owners in both the private and public sector made significant investments in time and money to become compliant with the rules. In 2016 other parties within the MLTS owner community approached the Legislature for another extension of the deadline. The SNC supported the extension with the qualified position that it be the final extension and MLTS be implemented statewide by the end 2019. Subsequently, P.A. 878 of 2016 was enacted and the deadline for MLTS was extended to December 31, 2019.

Now, in this current Legislative session, proposed Senate Bill 314 seeks to repeal language in P.A. 349 of 2007. If passed, this legislation would remove all the MPSC's authority to promulgate rules related to MLTS and eliminate any requirements for vital dispatchable location information. The SNC is opposed to the legislation and the impact it will have on the 911 callers from buildings with significant square footage (7,000 sq. ft. or more per area), multiple locations on the same switch, or multiple floors at a single location. We believe the timelines posed to accommodate the requirements set forth in the MLTS rules are workable within the time of rapidly changing technology and telephone equipment replacement cycles. The SNC also believes in the public policy that has supported MLTS changes in states such as Washington, Minnesota, Vermont, and Maine.

Please join us in making Michigan a safer place to work and do business by not supporting SB 314 and continuing our forward progress to an improved 911 location accuracy for MLTS statewide.

Sincerely,



Mr. Jeff Troyer, Chair  
Michigan State 911 Committee



Ms. Harriet Miller-Brown  
State 911 Administrator

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<sup>2</sup> P.A. 165 of 2007

<sup>3</sup> The full MLTS rule set can be found at: [http://w3.lara.state.mi.us/orr/Files/AdminCode/1638\\_2016-030LR\\_AdminCode.pdf](http://w3.lara.state.mi.us/orr/Files/AdminCode/1638_2016-030LR_AdminCode.pdf)