

Office of the County Auditor
Auditor's Analysis

Council Bill No. 59-2020

Introduced: November 2, 2020

Auditor: Michael A. Martin

Fiscal Impact:

The fiscal impact of this legislation is currently unknown.

The Police Department confirmed there will be costs associated with the Public Awareness Campaign. However, these expenditures are not expected to exceed the allotted amount approved in the Fiscal Year 2021 Approved Operating Budget. **We have requested additional details regarding the specific costs.**

The Department of Technology & Communications may incur overtime costs as system enhancements are made to comply with Kari's Law and the Ray Baum Act. Additional details on these federal laws can be found in **Attachment A** below. **We have requested additional details regarding overtime costs.**

There will be no need to install new hardware, although software adjustments will be required to enhance compliance.

The Police Department does not anticipate collecting fines during the first year of enforcement, or even thereafter, as their goal focuses on raising awareness and promoting voluntary compliance.

Purpose:

This legislation would require all multiple-line telephone systems (MLTS) to allow direct dialing of 911 and establish inspections and penalties relating to the implementation of such direct access.

Other Comments:

Compliance with Kari's Law is required for the County to receive funding from the 911 Trust Fund, which awarded the County \$2.8 million through the 3rd Quarter of FY 2020.

Currently employed, part-time Fire Department Code Enforcement Inspectors have already begun verifying compliance during normal business checks for fire code requirements. These new inspections should not require additional resources.

Attachment A¹

Ray Baum Act – Dispatchable Location for MLTS

The Federal Communications Commission (FCC) adopted rules to ensure that the “dispatchable location” is conveyed with 911 calls to dispatch centers, regardless of the technological platform used, including 911 calls from MLTS. Dispatchable location means a location delivered to the public safety answering point (PSAP) with a 911 call that consists of the validated street address of the calling party, plus additional information such as suite, apartment, or similar information necessary to adequately identify the location of the calling party.

Kari’s Law – Direct Dialing and Notification for MLTS

This law requires direct 911 dialing and notification capabilities in MLTS, which are typically found in enterprises such as office buildings, campuses, and hotels. These requirements became effective February 16, 2020, two years after the enactment date of Kari’s Law. In addition, Kari’s Law and the federal rules are forward-looking and apply only with respect to MLTS that are manufactured, imported, offered for first sale or lease, first sold or leased, or installed after February 16, 2020.

¹ Information on these federal laws obtained from FCC website:
<https://www.fcc.gov/mlts-911-requirements>