



**VIP**  
TECHNOLOGY  
SOLUTIONS GROUP



**VIP**  
VOICE SERVICES

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[www.viptsg.com](http://www.viptsg.com)

To Whom It May Concern:

We at VIP Technology Solutions Group, L.L.C. and VIP Voice Services, L.L.C. (“VIP”), want to thank you for your continued confidence in our service and support of your communication infrastructure and equipment. We sincerely appreciate each and every customer and value our partnership with your organization.

You may have heard of some legislative changes in the Telecom industry affecting 9-1-1 functionality and notification; specifically, Kari’s Law and Ray Baum’s Act (collectively the “New Laws”).<sup>1</sup> While there has been much speculation and concern over the New Laws, their impact on the services we provide are likely quite minimal. As a VIP customer, you have already made the decision to acquire state-of-the-art technology from VIP, and your systems are likely already prepared to implement the requirements of the New Laws, if they are not already part of your system’s functionality. Nevertheless, we are notifying you of these New Laws to further our internal compliance efforts and to give you a chance to identify any opportunities for us to improve our level of service.

Essentially, the New Laws require two things. First, Kari’s Law requires a Multi-Line Telephone System (“MLTS”) to be configured to dial 9-1-1 in three keystrokes and be connected to a 9-1-1 call center. In other words, an MLTS must enable users to dial 9-1-1 directly, without having to dial any additional digit, code, prefix, or post-fix, including any trunk-access code such as the digit ‘9’, to reach an outside line. Most, if not all of VIP’s installed base, currently has this capability. If your organization’s system requires a “user” to dial a digit to acquire an outside line, however, please contact VIP and we will assist you with making any changes necessary to comply with this requirement.

To test your system, simply pick up a handset and dial 9-1-1. Let the call connect to the 9-1-1 call center and inform the operator the name of your organization and that there is not currently an emergency. Let the operator know that you are testing your system’s 9-1-1 functionality. Inform the operator of the address from which you are calling and confirm that it matches the address that is displayed to their system. They will be familiar with this and you should be able to terminate the call at that point unless instructed otherwise by the 9-1-1 operator. Kari’s Law also requires that, when a 9-1-1 call is made, there must be some type of internal notification to a central location at the facility where the system is installed (e.g. an organization’s system administrator, safety director, executive operations manager, etc.), or to another person or organization regardless of the location, if the system is able to be configured to provide the notification without an improvement to the hardware or software of the system.

Kari’s Law goes into effect February 16, 2020, and applies only to MLTS’s that are manufactured, imported, offered for first sale or lease, first sold or leased, or installed after that date.

Second, the Ray Baum's Act requires the conveyance of a "dispatchable location" to the Public Safety Answering Point ("PSAP") during 911 calls, regardless of the technological platform used. Pursuant to that directive, an MLTS is required to convey the street address of the calling party, and additional information such as room number, floor number, or similar information necessary to adequately identify the location of the calling party. MLTS marketplace participants are afforded flexibility in deciding what level of detail should be included in the location information provided to PSAPs for particular environments, so long as the level of detail is functionally sufficient to enable first responders to identify the location of a 911 call in that environment.

To that end, VIP requests your organization to assess its geography and determine the appropriate level of detail that should be provided to the PSAP in connection with a 9-1-1 call. Following that assessment, please contact VIP so that we may take actions we may deem necessary to comply with the Ray Baum's Act. Should you have any questions regarding the level of detail that should be provided for your organization's location information, we strongly urge you to consult with your legal counsel.

<sup>1</sup> The details of Kari's Law and Ray Baum's Act can be reviewed at the following URL:  
<https://www.federalregister.gov/documents/2019/12/05/2019-20137/implementing-karis-law-and-raybaums-act-inquiry-concerning-911-access-routing-and-location-in>

VIP stands ready to assist your organization with the above-described or any other telecommunications needs. Please feel free to contact us at 918-279-7000 with questions or concerns and we will have one of our industry leading experts ready to assist you.

Very Respectfully,

VIP Technology Solutions Group, LLC  
VIP Voice Services, LLC