



APCO International
Association of Public Safety Communications Officials



The Keystone Chapter of the National Emergency Number Association
(PA NENA)

and

The Pennsylvania Chapter of the Association of Public Safety Communications
Officials International (PA APCO)

***Position Paper on Accessing 9-1-1 from Multi-Line Telephone Systems (MLTS) and
Private Branch Exchanges (PBX)***

The country's 9-1-1 centers and public safety responders rely on accurate automatic location information to be provided when callers cannot relay their location information. Traditional home (wireline) phones produce the address of a citizen to the 9-1-1 centers via a database listing the address of the caller (phone number and address are accurately maintained and linked). Multi-line telephone systems (MLTS), including private branch exchanges (PBX), usually provide 9-1-1 centers with only the phone number and location of the billing address. Technical solutions, including databases linking internal phone numbers (extensions) to more precise locations such as a suite/apartment number and/or floor level are available, but are not being used on a widespread basis. Without precise location information, emergency responders can be delayed while trying to find the location of the caller in need.

Many corporations (large and small), hotels, schools, universities and government agencies employ MLTS. These systems are characterized by a central switchboard connected to a number of either on-premise or off-premise extensions. Connection to an out-dial trunk on systems of this type typically require the dialing of an extra digit (such as nine) to reach an outside phone connection. Increasingly, residential complexes are turning to MLTS for their residents. It has been estimated that perhaps as many as half of the population is living, working or studying behind an MLTS or PBX each day. Many facility owners that currently use MLTS or PBX systems are unaware of the problem.

Very few communities, and fewer states, have required MLTS or PBX owner/operators to install the available technological fix, keep the necessary databases up-to-date or even require awareness education to the many users of these imperfect systems. Little has been done for those 9-1-1 callers in commercial, educational, medical or other facilities that use MLTS.

Location technology that solves the problem of providing more precise location information on 9-1-1 calls to PSAPs already exists for MLTS and is being used by some MLTS operators in the United States and elsewhere.

Where the solutions have not been mandated, few organizations have been proactive in implementing them. ALI from MLTS can and should be universally provided in those environments, such as large, multi-floor or multi-building organizations, where public safety responders might be delayed by not knowing the precise location (building, suite, floor, etc.) of a 9-1-1 caller.



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In addition, others recognize and have taken action such as that suggested in a study on risk management, which found that for every dollar a company spends on safety they can expect a threefold savings. E9-1-1 systems help address a problem quickly so it does not turn tragic, potentially destroying people and property. The lack of an adequate E9-1-1 system is a potentially catastrophic financial and human risk. Past court decisions have held institutions and managers personally liable for safety and negligence. Knowing that MLTS without E9-1-1 capabilities are being used and could be corrected is risky.

MLTS is something that can be acted upon now and fixed with current technology. It is absolutely essential that national and state policy makers exert stronger pressure to ensure all jurisdictions move forward with some form of effective regulation regarding the provision of the location of 9-1-1 callers from within an MLTS. As technology advances, 9-1-1 ALI is moving backwards. It is apparent with wireless E9-1-1 and is becoming prevalent with the use of VoIP.

The measures needed for MLTS should be deployed now so that they can be carried forward with the new technology. Otherwise, it could become more difficult and costly, and become lost with the technology that will be unleashed in the not too distant future. The unfortunate result could be loss of life. As with wireless E9-1-1, it will take a government mandate for businesses to fully implement location capable MLTS. A major tragedy should not be the impetus for change.

It is the position of the Pennsylvania Chapters of APCO and NENA that:

- 9-1-1 services should be universal.
- 9-1-1 services should be transparent to the caller whether they are calling from a home or a business.
- The needs of public safety transcend the issues with employing the technological fixes for MLTS/PBX.
- The business community and public safety should work together to address the needs of public safety as they relate to MLTS/PBX.
- Location information is one of the most critical components of information that can assist in appropriate response to a request for service.
- By effectively addressing the issues with MLTS/PBX, lives and property can be better protected and public expectations regarding 9-1-1 responses can be met.
- It is incumbent upon the public safety community to heighten the awareness of the issues with MLTS/PBX and work toward effective resolution to the problem.

House Bill 224 with some revisions added by the Pennsylvania Chapters of APCO and NENA has been accepted by our organizations as a workable solution to the MLTS problem and we request your support in passing this bill.

Please feel free to contact us at the numbers below. We are open and willing to answer any questions you may have.

PA NENA Executive Board

Mike McGrady 412-580-7632
E-Mail: Mike@MCMConsultinggrp.com

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Carlton B. Walls III, ENP 717-664-1106
E-Mail: cwalls@lcwc.co.lancaster.pa.us