

**TO: Members of the Communications and Technology Committee**

**FROM: Coalition Supporting SB 878**

**DATE: June 7, 2016**

**RE: MULTI LINE PHONE SERVICE (MLTS) RULES: Delay Implementation with Passage of SB 878**

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On June 1, the senate took bi-partisan action and passed SB 878 with a 36 – 0 vote. This action was imperative as thousands of businesses, schools, municipalities and other entities across the state could be negatively impacted if SB 878 is not passed before summer recess.

A broad coalition has formed to support the passage of SB 878 which delays the implementation of multi-line telephone systems (MLTS) rules from December 31 of this year until 2019. We urge your support of SB 878 and have provided some background information for your review.

Please call on us if you have any questions regarding this legislation.



**SB 878 - MULTI LINE PHONE SERVICE (MLTS) RULES:  
Delay Implementation Until Questions Can Be Answered**

On December 31, 2016, a new set of regulations will be imposed on Michigan businesses as well as schools, municipalities or any other non-residential building over 7000 square feet. These rules were promulgated by the Michigan Public Service Commission (MPSC) at the request of the Michigan State Police's State 911 Committee (SNC). They require owners of multi-line telephone systems (MLTS) to pinpoint the exact location of every telecommunications device capable of calling 911 within a building or campus of buildings. While the intent is laudable, the rules are a disaster for the following reasons:

- **The rules now impact buildings greater than 7,000 square feet, instead of the original 40,000 square foot threshold.** As originally promulgated in 2009, these rules applied to buildings larger than 40,000 square feet and created such an uproar from large businesses and universities that the legislature delayed their implementation until the end of this year. The rules were then amended and now apply to buildings more than 7,000 square feet. By shrinking the square footage threshold, the rules greatly expanded in scope without input from the impacted businesses.
- **The SNC cannot give definitive answers about how businesses are supposed to comply with rules.** Questions posed to the State 911 Office have been left unanswered, as an "informal volunteer group" within the SNC works to interpret the rules and offer compliance advice. With fines and penalties on the line, it is inappropriate for businesses to rely on their informal interpretation of the rules. Further, businesses are directed to work with their local PSAP on compliance standards. This most assuredly will result in a patchwork of compliance standards. For businesses that operate across Michigan, we need one compliance standard, one state agency to contact and clear and concise rules.
- **Without clear compliance standards in place, businesses risk being taken advantage of by "consultants" selling expensive, potentially unnecessary, upgrades.** Why should businesses be forced to make costly upgrades to their telecom systems when the SNC can't tell them whether or not these costly upgrades would bring them into compliance?

We urge you to take action on this problem by passing SB 878.