



AUTO ATTENDANT / RESEARCH & PRACTICAL GUIDANCE

Kari's Law and RAY BAUM'S Act for Small Business Phones

Get a business phone number with a simple auto attendant menu from Auto Attendant. A caller picks who they need and the call rings that person's own mobile, so nobody on your team has to publish a personal number.

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Why Kari's Law exists

In 2013, Kari Hunt was killed by her estranged husband in a motel room in Marshall, Texas. Her nine-year-old daughter tried to call 911 from the room phone four times. None of the calls went through, because the motel's phone system required dialing 9 for an outside line first ([FCC, MLTS 911 Requirements](#)).

Congress responded with the Kari's Law Act of 2017 (H.R. 582), which became Public Law 115-127 on February 16, 2018 ([Congress.gov, H.R.582](#)). On March 23, 2018, Congress enacted RAY BAUM'S Act as Division P of Public Law 115-141. Its Section 506 told the FCC to consider rules so that a "dispatchable location is conveyed with a 9-1-1 call, regardless of the technological platform used and including with calls from multi-line telephone systems" ([Public Law 115-141, Div. P, sec. 506](#); [FCC blog](#)). In August 2019 the FCC adopted one set of rules implementing both laws ([FCC, MLTS 911 Requirements](#)). They now sit in 47 CFR Part 9, Subpart F.

In July 2025 the FCC's Public Safety and Homeland Security Bureau launched a renewed outreach initiative to "raise awareness and improve compliance" with these rules ([FCC blog](#)). If your office runs a phone system with several lines or extensions, this is the plain-language version of what the rules ask, as of October 2026.

This article is educational information, not legal advice. For a specific system, check the rule text linked below or ask a telecom lawyer.

Kari's Law in one minute: direct dialing and notification

The FCC rule has two duties for whoever installs, manages or operates a multi-line telephone system (MLTS).

1. Direct dialing. The system must be configured so that "a user may directly initiate a call to 911 from any station equipped with dialing facilities, without dialing any additional digit, code, prefix, or post-fix, including any trunk-access code such as the digit 9", even if that prefix is required for other calls ([47 CFR 9.16\(b\)\(1\)](#)). You may keep "9-911" working as an extra dialing pattern, but only in addition to plain 911 ([47 CFR 9.3, "Configured"](#)).

2. Notification. The system must be configured to send an "MLTS notification" to a central location at the facility, or to another person or organization anywhere, if the system can do so without an improvement to its hardware or software. The notification must start at the same time as the 911 call if technically feasible, must not delay the 911 call, and must go to a location where someone is likely to see or hear it ([47 CFR 9.16\(b\)\(2\)](#)).

The definition says what the notification must contain, at a minimum ([47 CFR 9.3, "MLTS notification"](#)):

1. the fact that a 911 call has been made;
2. a valid callback number; and
3. the location information the system sends to the 911 center (PSAP) with the call.

The callback number and location can be left out only where it is technically infeasible to include them. The FCC's examples of acceptable notification are an on-screen message with an audible alarm on a security desk computer, a text message to a smartphone, or an email to administrators ([FCC, MLTS 911 Requirements](#)). The purpose, in the FCC's words, is to "facilitate building entry by first responders": someone on site knows to meet them at the door.

RAY BAUM'S Act Section 506: dispatchable location

Kari's Law makes sure the call connects. Section 506 deals with the next problem: responders arriving at a large building with no idea which floor or suite to go to.

"Dispatchable location" is "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" ([47 CFR 9.3](#)). The rules took effect on January 6, 2020 ([FCC, 911 Dispatchable Location](#)), with later compliance deadlines that depend on the type of device.

MLTS deadlines ([47 CFR 9.16\(b\)\(3\)](#)):

Device on the MLTS	Deadline	What it must send
On-premises fixed telephone (a desk phone wired in place)	January 6, 2021	Automated dispatchable location
On-premises non-fixed device (a softphone or wireless handset used around the building)	January 6, 2022	Automated dispatchable location when technically feasible; otherwise location based on the user's manual update, or "alternative location information"
Off-premises device (a softphone at home or on the road)	January 6, 2022	Automatic dispatchable location if technically feasible; otherwise the user's manual update, or "enhanced location information" (best available location at reasonable cost)

Alternative location information may be coordinate-based but must be enough to identify the caller's civic address and approximate in-building location, including floor level in large buildings ([47 CFR 9.3](#)).

Interconnected VoIP providers have parallel deadlines. The dispatchable location rule for interconnected VoIP providers is in [47 CFR 9.11\(b\)](#), which applies "on or after January 6, 2021, for fixed services, and on or after January 6, 2022, for non-fixed services". Fixed services must provide automated dispatchable location with each 911 call. Non-fixed services must provide it if technically feasible, otherwise a Registered Location the customer can update "at will and in a timely manner", or alternative location information ([47 CFR 9.11](#)). On January 14, 2026 the FCC's "Delete, Delete, Delete" rule ([FCC 25-80](#), effective March 16, 2026) removed the old paragraph 9.11(a), the earlier VoIP E911 rules that 9.11(b) had already replaced; it did not change the current duties in 9.11(b) or the MLTS rules in 9.16 and 9.17 ([91 FR 1400](#)). Older vendor summaries may still quote the deleted text.

The practical split: your VoIP provider carries duties for its service, and whoever manages your MLTS carries duties for how the system is set up. Neither replaces the other.

Does your small business phone system count as an MLTS?

The rule's definition is broad. An MLTS is "a system comprised of common control units, telephone sets, control hardware and software and adjunct systems, including network and premises based systems, such as Centrex and VoIP, as well as PBX, Hybrid, and Key Telephone Systems", and it covers systems of government agencies, non-profits and "for profit businesses" ([47 CFR 9.3](#)).

Three points follow from that text:

- **Hosted counts.** "Network ... based systems, such as Centrex and VoIP" are named, so a cloud PBX is not excluded just because there is no box in the closet.
- **No size threshold appears in the definition.** It does not exempt small businesses or systems below a certain number of lines.
- **The FCC describes MLTS as systems with multiple phones or extensions** that support internal calls "and also allow users to make calls to outside telephone numbers, including emergency calls to 911" ([FCC blog](#)).

A single phone line plugged into a single handset is a different case from a system with extensions. Where your setup sits between the two (a few desk phones on a hosted plan, softphones on laptops, a mix of both), assume the rules may apply and check with your provider in writing.

Who is on the hook: sellers versus installers and operators

The statute splits the duties into two groups ([47 U.S.C. 623](#), [Cornell LII](#); [47 CFR 9.16](#)):

Who	Duty
Manufacturers, importers, sellers and lessors	Sell or lease only systems pre-configured for direct 911 dialing once properly installed, and capable of providing dispatchable location
Installers, managers and operators	Configure and run the system so users can dial 911 directly, so notification is sent, and so dispatchable location reaches the 911 center

The definitions show that a small business can be in the second group without being in the telecom business ([47 CFR 9.3](#)):

- An **installer** configures the system or gets it ready to operate, including "establishing the dialing pattern for emergency calls". The installer "may be the MLTS manager or a third party acting on behalf of the manager".
- A **manager** controls and oversees the system after installation: distributing lines, "assigning and reassigning telephone numbers, and ongoing network configuration".
- An **operator** is "responsible for the day-to-day operations".

The office manager who adds a new hire's extension in the admin portal is doing a manager's task. That matters because, if a system does not comply with the installer/manager/operator duties, "the person engaged in the business of managing the multi-line telephone system shall be presumed to be responsible" ([47 CFR 9.17\(a\)\(2\)](#)).

Legacy systems and what changes when you upgrade

The rules are forward-looking. They apply to systems "manufactured, imported, offered for first sale or lease, first sold or leased, or installed after February 16, 2020", which is the compliance date for Subpart F ([47 CFR 9.17\(b\)](#)). A system installed on or before that date is exempt from Kari's Law and these rules ([FCC, MLTS 911](#)

Requirements).

Two practical consequences:

- **An old system is not grandfathered forever in practice.** A replacement or new installation after February 16, 2020 falls under the rules. If you move to a hosted system, the new system is in scope from day one.
- **Notification has a built-in limit.** The notification duty applies only if the system can provide it "without an improvement to the hardware or software" (47 CFR 9.16(b)(2)). The definitions treat upgrades to core systems, substantial software upgrades and software upgrades "requiring a significant purchase" as improvements (47 CFR 9.3). Direct dialing has no such limit.

A practical compliance checklist

Work through this with whoever set up your system. Get answers from your provider in writing.

Direct dialing

- ☐ Find out when your current system was installed or first leased. Note the date.
- ☐ From every type of device (desk phone, cordless, softphone on a laptop, mobile app), confirm that dialing 911 with no prefix connects. Ask your provider and your local 911 authority how they want test calls handled before you place one.
- ☐ If staff are used to dialing 9 first, keep 9-911 working too, but only as an addition to plain 911.

Notification

- ☐ Decide who receives the notification: front desk screen, an office manager's phone by text, a shared email address someone actually watches.
- ☐ Confirm the notification includes that a 911 call was made, the callback number and the location sent to the 911 center.
- ☐ Re-check the recipient whenever that person leaves or the front desk moves.

Dispatchable location

- ☐ For each fixed desk phone, confirm the address on file includes suite and floor.
- ☐ For softphones and remote staff, ask how location is captured: automatically, by the user updating it, or by alternative location. Tell staff how to update it if manual.
- ☐ Update locations when you move offices, add a floor, or someone starts working from home.

Records

- ☐ Keep a one-page note: system, install date, who manages it, notification recipient, last test date.

Where a forwarding-style number fits

Many small businesses no longer have desk phones. Calls to the business number go to a phone menu that rings staff mobiles, and every 911 call is made from those mobiles over the mobile carrier's network.

Our reading, not legal advice: the 911 duties are framed around calls users place. Kari's Law is about a user who can "directly initiate a call to 9-1-1 from any station equipped with dialing facilities" ([47 U.S.C. 623](#)), and an interconnected VoIP service must be able both to receive calls from and to make calls to the public phone network ([47 CFR 9.3](#)). A number that only receives and forwards calls, and cannot originate any call, is neither. It has no 911 call to route; the 911 call is carried by the mobile that dials it. A setup that also lets staff place calls through the business system is a different case and should be checked.

Auto Attendant only receives calls on the business number and rings team members' own mobiles. It places no outbound calls and provides no 911 service. Its [emergency calling page](#) sets out that position with the rules quoted. If your business also runs desk phones or softphones on another system, that system is where the checklist above applies. Terms used here are defined in the [glossary](#).

FAQ

Is there a penalty?

The rules say the direct-dialing and notification requirements are enforced under Title V of the Communications Act, with section 501 applying "only to the extent that such section provides for the punishment of a fine" ([47 CFR 9.17\(a\)\(1\)](#)). The MLTS manager is presumed responsible for setup failures ([47 CFR 9.17\(a\)\(2\)](#)), and anyone alleging a violation can file a complaint with the FCC ([47 CFR 9.17\(a\)\(3\)](#)). For a business that holds no FCC license, the forfeiture cap is up to \$25,132 per violation or per day of a continuing violation, and up to \$188,491 for a continuing violation, as adjusted for inflation in 2025 and current in October 2026 ([47 U.S.C. 503\(b\)\(2\)\(D\)](#); [47 CFR 1.80\(b\)](#)). For a person with no FCC authorization, the FCC generally must issue a citation first, before it can propose a fine ([47 U.S.C. 503\(b\)\(5\)](#)).

Do I need to tell staff?

The rules reviewed here do not contain a separate staff-training duty for MLTS operators. Practically, staff need to know three things: dial 911 directly, who gets the notification, and how to update their location on a softphone if updates are manual. Interconnected VoIP providers do have a duty to advise subscribers, "prominently and in plain language", of circumstances in which E911 may be limited or unavailable ([47 CFR 9.11](#)), so read what your provider sent you.

Does it apply to home offices?

Devices used off premises that are part of an MLTS have their own dispatchable location rule: automatic location if technically feasible, otherwise the user's manual update or enhanced location information, from January 6, 2022 ([47 CFR 9.16\(b\)\(3\)\(iii\)](#)). Wireless carriers are outside the dispatchable location rules and have separate location accuracy requirements ([FCC, 911 Dispatchable Location](#)).

Do state rules still apply?

Yes, they can. Nothing in the direct-dialing and notification rules is intended to alter the authority of state or local emergency communications agencies where their rules are consistent with the federal ones ([47 CFR 9.17\(c\)](#)).

What about Canada?

Kari's Law and RAY BAUM'S Act are US laws. Canadian 9-1-1 rules come from the CRTC; the [emergency calling page](#) summarizes them.

Source links

Links cited in this article, in order of first appearance. Full addresses are provided for readers using extracted text.

1. <https://www.fcc.gov/mlts-911-requirements>
2. <https://www.congress.gov/bill/115th-congress/house-bill/582>
3. <https://www.govinfo.gov/content/pkg/PLAW-115publ141/html/PLAW-115publ141.htm>
4. <https://www.fcc.gov/news-events/blog/2025/07/28/multi-line-telephone-systems-can-you-connect-911>
5. <https://www.ecfr.gov/current/title-47/section-9.16>
6. <https://www.ecfr.gov/current/title-47/section-9.3>
7. <https://www.fcc.gov/911-dispatchable-location>
8. <https://www.ecfr.gov/current/title-47/section-9.11>
9. <https://www.federalregister.gov/documents/2026/01/14/2026-00612/delete-delete-delete>
10. <https://www.law.cornell.edu/uscode/text/47/623>
11. <https://www.ecfr.gov/current/title-47/section-9.17>
12. <https://www.law.cornell.edu/uscode/text/47/503>
13. <https://www.ecfr.gov/current/title-47/section-1.80>

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About Auto Attendant

Auto Attendant gives a small business one phone number and a recorded menu that sends each caller to the right person. The call rings the mobile that person already carries, using their normal dialler and their normal mobile plan. Pricing is a single flat monthly fee for the whole company rather than a charge for each user, and there is no app, desk phone or hardware to install.

One number, one menu, the phones you already own

A caller dials the business number, hears a short greeting and chooses an option. Each option can ring one mobile, ring several at once so whoever is free answers first, or try people one after another in a set order. There is no limit on how many people sit on the receiving end, because nobody is billed per seat. Setup is done by the owner in a few minutes: pick a number, write the greeting, and point each option at a mobile.

What it deliberately is not

An auto attendant routes a call; it does not answer one. Nobody at Auto Attendant speaks to callers, and no AI stands in for a receptionist. A business that wants its calls handled, messages taken and appointments booked wants an answering service, which is a different product at a different price. A business that needs call recording, queues, agent dashboards or CRM integration wants a contact centre platform. Auto Attendant is for the case where the call should simply reach the right pocket.

Keeping personal numbers off the internet

The business number is the only number a caller ever sees. Personal mobile numbers are never displayed and never given out, which is what lets an owner put a number on a website, an invoice, a van or a Google Business Profile without handing a personal line to everyone who finds it. An existing advertised number can be ported across and kept, and the old line keeps working while the port is in progress.

Work with Auto Attendant

Visit [Auto Attendant](#) to see [how it works](#), [how it compares](#) to a personal mobile, Google Voice and a full phone platform, and the current [pricing](#).

Telephone number portability, emergency calling and caller-ID rules differ by country and change over time. Articles published here describe general practice and cite primary regulator and carrier sources; they are not a guarantee of any timeline, and they are not legal or regulatory advice for a specific business.

Website: <https://autoattendant.io>

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