

Andrews University

May 25, 2016

Dear Members of Michigan Senate Commerce Committee,

Andrews University supports the approval of SB 878 because it uses terminology to define "specific location" using the language found in the National Emergency Number Association (NENA) model legislation for E9-1-1 services to users of multiline telephone systems (MLTS). Because NENA members are professionals in the fields of public safety, 9-1-1 system administration and operations, communications services, and communications equipment, the language they have chosen can actually be implemented in the real world.

Pennsylvania has chosen to implement NENA's model legislation almost verbatim. If this were done in Michigan, it would probably make E9-1-1 implementation easier for many MLTS operators. At this juncture it is probably unreasonable to expect amendments of this magnitude to be incorporated into Michigan law and the attendant rulemaking process to be completed before deadlines already enacted into law.

We are requesting consideration of an additional amendment to subsection (2) of SB 878. This would provide an exemption for MLTS operators who implement what NENA refers to as "Local Notification". Local notification is available from most of the major manufacturers of large MLTS systems. Cisco, Avaya, Nortel (now part of Avaya), ShoreTel, and others have offered this feature for years, sometimes for no additional charge to their customers.

Using language taken from the NENA definition for "Local Response" as found in their model E9-1-1 MLTS legislation, here is Andrews University's proposed addition to subsection (2):

THIS SECTION SHALL NOT APPLY TO MULTILINE TELEPHONE SYSTEMS THAT HAVE IMPLEMENTED A SYSTEM CAPABILITY WHEREBY A CALL TO 9-1-1 FROM A MULTILINE TELEPHONE SYSTEM EXTENSION IS DIRECTED THROUGH THE 9-1-1 NETWORK TO A PUBLIC SAFETY ANSWERING POINT AND SIMULTANEOUSLY NOTIFIES AN ATTENDANT OR DESIGNATED PERSONNEL TO IDENTIFY THE LOCATION OF THE TELEPHONE THAT HAS DIALED 9-1-1.

Sincerely,



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