

## Guidance for Multiline Telephone System Operators Filing Notice of Failure to Comply with Section 413 of the Emergency 9-1-1 Services Enabling Act.

Effective June 25, 2019, Section 413 of the 911 Act was amended through Public Act 30 of 2019. The Act codified requirements for Multiline Telephone System (MLTS) Operators to provide dispatchable location information when 911 is dialed. PA 30 also set a December 31, 2020 deadline for MLTS Operators to come into compliance with the statutory requirements. Providers not in compliance with the Act by the established deadline must provide notice of non-compliance to the Michigan Public Service Commission (MPSC) and State 9-1-1 Committee and provide a remediation plan.

Sections 413(18) and 413(19) of the 911 Act provide as follows:

413(18) An MLTS operator in violation of this act after December 31, 2020 shall provide the commission and the committee information on the failure to meet the deadline and within 60 days after the violation provide a plan to remedy the failure within 6 months.

413(19) An MLTS operator in violation of this act after December 31, 2020 may be assessed a fine by the commission from \$500.00 to \$5,000.00 per offense. An MLTS operator with 50 or fewer employees may be assessed a fine by the commission of up to \$500.00 per offense.

### **Guidance for Submission of Notices and Plans to Remedy**

As cited above and pursuant to section 413(18), MLTS operators must provide MPSC staff and the State 911 Committee notice that it failed to meet the deadline to implement the requirements for an MLTS to the Commission and SNC within 60 days after December 31, 2020. The notice must also provide a plan to remedy the failure within 6 months.

Notifications should include:

- Contact information for the MLTS Operator to field any questions that may arise from the notice.
- Any necessary information regarding the failure to meet the deadline.
- A plan to remedy the failure within a six-month timeframe. If the MLTS Operator is already in the process of upgrading their MLTS and has a remedy plan in place which includes an estimated timeline for completion, that information should be included with the notice.
- Address for each location. If the MLTS system has more than one physical location, please include all of the locations in one notice rather than submitting separate notices for each location.

Upon receiving a notification from an MLTS operator, the MPSC will review the notice and remedy plan. The MPSC will contact the MLTS Operators with any questions concerning the MLTS Operator's timeline for compliance.

Once the upgrade has been completed, the MLTS operator should notify the MPSC and the SNC of the completion.

For the convenience of the MLTS Operators, a template form to submit to the MPSC and the SNC is provided below.

**Should a MLTS Operator fail to comply with the MLTS requirements after the six-month timeline, the MPSC may assess a fine as outlined in section 413(19) of the Act to the MLTS Operator if good cause is shown that the MLTS operator is not making a good faith effort to comply with the requirements.**

### **Further Guidance and Resources**

To assist MLTS Operators in understanding the statutory MLTS requirements, the State 911 Committee crafted guidance documents and posted them to their website at the following links.

State 911 Committee Interactive Flowchart:

[https://www.michigan.gov/documents/msp/MLTS\\_Flow\\_Chart\\_\\_9-11-19\\_666215\\_7.pdf](https://www.michigan.gov/documents/msp/MLTS_Flow_Chart__9-11-19_666215_7.pdf)

State 911 Committee MLTS Guidelines:

[https://www.michigan.gov/documents/msp/6bRevisions\\_MLTS\\_Guidelines\\_for\\_SNC\\_with\\_Karis\\_Law\\_FINAL\\_DRAFT\\_666216\\_7.pdf](https://www.michigan.gov/documents/msp/6bRevisions_MLTS_Guidelines_for_SNC_with_Karis_Law_FINAL_DRAFT_666216_7.pdf)



# Michigan Public Service Commission

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**MLTS Operator name**

**MLTS Operator address**

**Contact information for questions about the notice**

Name Address

Phone Email

**MLTS location(s) addresses affected** (Please provide additional locations on page 3 if applicable)

1.	Address	City	State	Zip Code
2.	Address	City	State	Zip Code
3.	Address	City	State	Zip Code
4.	Address	City	State	Zip Code

**Reason for non-compliance**

**MLTS Operator’s plan to remedy the violation**

Date of expected compliance or completion of system upgrade, if applicable:

**Any other information the MLTS Operator wishes to provide**

**Send notices to both the Michigan Public Service Commission and the State 911 Office.**

Michigan Public Service Commission  
Executive Secretary  
P.O. Box 30221  
Lansing, MI 48909

State 911 Office  
c/o Ms. Stacie Hansel  
P.O. Box 30634  
Lansing, MI 48909

Or email [mcconkiej@michigan.gov](mailto:mcconkiej@michigan.gov)

Or email [hansels@michigan.gov](mailto:hansels@michigan.gov)



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### CONT. MLTS location(s) addresses affected (if applicable)

5.	Address	City	State	Zip Code
6.	Address	City	State	Zip Code
7.	Address	City	State	Zip Code
8.	Address	City	State	Zip Code
9.	Address	City	State	Zip Code
10.	Address	City	State	Zip Code
11.	Address	City	State	Zip Code
12.	Address	City	State	Zip Code
13.	Address	City	State	Zip Code
14.	Address	City	State	Zip Code
15.	Address	City	State	Zip Code
16.	Address	City	State	Zip Code
17.	Address	City	State	Zip Code
18.	Address	City	State	Zip Code
19.	Address	City	State	Zip Code
20.	Address	City	State	Zip Code
21.	Address	City	State	Zip Code
22.	Address	City	State	Zip Code
23.	Address	City	State	Zip Code
24.	Address	City	State	Zip Code
25.	Address	City	State	Zip Code
26.	Address	City	State	Zip Code
27.	Address	City	State	Zip Code
28.	Address	City	State	Zip Code
29.	Address	City	State	Zip Code