

**OREGON PUBLIC UTILITY COMMISSION  
INTEROFFICE CORRESPONDENCE**

**DATE:** November 5, 2020

**TO:** File through Mike Dougherty and Bruce Hellebuyck

**FROM:** Malia Brock

**SUBJECT:** UNITED TELEPHONE COMPANY OF THE NORTHWEST:  
(Docket No. PL 157/Advice No. 20-004): Adds language pursuant to  
47 CFR §9.16(b)(1) and (2), pertaining to Kari's Law.

I have reviewed this filing and recommend that an acknowledgement letter be sent.

The filing was submitted on October 29, 2020 and will go into effect on November 1, 2020.

These changes will be reflected in United's Oregon Price List, Section 9, 1<sup>st</sup> Revised Page Number 1.

This filing adds language pursuant to 47 CFR §9.16(b)(1) and (2), pertaining to Kari's Law. Specifically, these revisions add language related to requirements that equipment manufactured after February 16, 2020 be configured to allow callers to dial "911" directly without first dialing an access code. Where applicable, features or calling options that allow configurations that require an access code before reaching the telephone company's network must not be configured as such for 911 calls.

Kari's Law is named in honor of Kari Hunt, who was killed by her estranged husband in a motel room in Marshall, Texas in 2013. Ms. Hunt's 9-year-old daughter tried to call 911 for help four times from the motel room phone, but the call never went through because she did not know that the motel's phone system required dialing "9" for an outbound line before dialing 911.

Congress responded by enacting Kari's Law in 2018. Kari's Law requires direct 911 dialing and notification capabilities in multi-line telephone systems (MLTS), which are typically found in enterprises such as office buildings, campuses, and hotels. The statute provides that these requirements take effect on February 16, 2020, two years after the enactment date of Kari's Law. In addition, Kari's Law and the federal rules implementing regulations apply only with respect to MLTS that are manufactured, imported, offered for first sale or lease, first sold or leased, or installed after February 16, 2020. This filing is consistent with federal requirements.

This filing will have no effect on annual revenues.