

CSULB E911 Service Implementation

Background

The Ray Baum's Act of 2018, which went into effect on January 6, 2022, requires all telephone service operators to provide dispatchable location information to emergency agencies in the event a client calls 911. There are generally two types of telephone service offered: fixed location (hard-wired telephone) and non-fixed (software-based service on a device such as a laptop, desktop, mobile phone). At CSULB, we offer both fixed (telephone deskset), and recently have added, due to the pandemic, non-fixed (software-based telephone) service.

Ray Baum Information:

- <https://csulb.teamdynamix.com/TDClient/1993/Portal/KB/ArticleDet?ID=140478>
- <https://www.congress.gov/bill/115th-congress/house-bill/4986/text?q=%7B%22search%22%3A%5B%22ray+baum%22%5D%7D>
- <https://www.fcc.gov/document/implementing-karis-law-and-section-506-ray-baums-act-0>

Problem Statement

At CSULB, our 911 solution for fixed locations has met Ray Baum act requirements for many years. All 911 calls from campus telephones reach the University Police Department (UPD) with dispatchable location because of detailed manual records that track an extension to a building and room.

For non-fixed, software-based phone service (laptop or remote desktop), the university telephone system manufacturer (Mitel) utilizes an e911 support provider (RedSky) to facilitate 911 dispatchable location information collection and call routing to local agencies. RedSky is one of only a few companies that performs this function for telephone service operators.

The exception is for software-based phone service provided by the university running on mobile devices (MiCollab app). These devices are natively compliant because 911 service on mobile devices automatically utilize GPS location information.

Stop-Gap Solution:

Our telephone system provider Mitel was delayed in partnering with RedSky, which resulted in delays in CSULB's implementation. As a result, we developed a stop-gap measure that ensures compliance with Ray Baum requirements while the permanent solution is implemented. Our current 911 call flow for fixed and non-fixed devices (excluding mobile devices), from both on and off-campus, delivers callers to our University Police Department (UPD) dispatch. Dispatchable location information about the caller is available to UPD for both on-campus and off-campus locations (current address on file with the University). This stop-gap measure was reviewed and approved by CSU Counsel.

Solution: RedSky Software Implementation

To ensure federal compliance, Division of Information Technology (DoIT) will push RedSky software to university-owned computers for employees who utilize the software-based phone service. RedSky provides two key functions: dispatchable location information gathering, and e911 routing to local agencies.

Dispatchable Location Information Gathering

Off-Campus Locations

Once installed, RedSky will prompt the employee to set an address when connected to a new off-campus Wi-Fi network. Once set, the software will not ask the user to register an address when connected to that specific Wi-Fi again. If the employee accesses their laptop at another off-campus location, RedSky will recognize it as a new location and will prompt them to register the address at that location. Employees will be required to enter accurate information to comply with the federal regulations, as the address entered will be provided to emergency responders, in the event the employee uses the university-provided software-based phone to call 911. Failure to comply could impact an employee's ability to telecommute and/or lead to corrective action. It could also result in penalty charges to the University, which will be incurred by the department.

On-Campus Locations

When on-campus, using a laptop with Wi-Fi enabled, RedSky will not prompt the user to self-identify the address as location services while on campus are provided by the university. Information based on their Wi-Fi connection will be provided to emergency providers if they use the device to call 911.

E911 Routing

If the employee uses their university-provided software-based phone on their laptop to call 911, RedSky will route the call to the appropriate local emergency provider (e.g. police/fire). Location information collected in RedSky will be provided to the emergency provider, whether the client is on or off-campus.

More Information About RedSky

- RedSky is a cloud service that went through all required University procurement channels for review and was also reviewed and approved by the Division of Information Technology information security team.
- Data collected and stored in RedSky:
 - CSULB Email Address
 - CSULB Software-Based Phone Number
 - First Name
 - Last Name
 - Address(s) registered
- Data collected and stored is considered Level 2 (Internal).
- There are currently 6 Division of Information Technology employees (2 MPPs, 4 staff) who have administrative access to RedSky, for purposes of administering the use of RedSky software on university owned equipment.
 - These employees do not receive updates regarding newly registered addresses.
- Information collected in RedSky is secure and is not shared with any campus entity.