


MLTS: Timelines and changes

An Update on PA 30 of 2019



Public Act 30 of 2019

Deadlines, Exemptions, and the SNC's role

- Signed by Governor Whitmer on June 25, 2019
- Changes moved from MPSC rules to 911 Michigan Statute
- Resources available at www.Michigan.gov/SNC



Public Act 30 of 2019

Deadlines, Exemptions, and definitions

Threshold for work space is still 7,000 square ft.

Deadline is now December 31, 2020 for any work space in excess of 20,000 square feet and 20 devices.

There is a limited number of post deadline exemptions until MLTS upgrades are made after January 1, 2020.

These extended exemptions are based on building type, size, and number of devices.



Public Act 30 of 2019

Deadlines, Exemptions, and definitions

"Work space" as replaced "area" – Work space is the physical building area where work is normally performed, measured by net square footage, including offices; production, warehouse, and shop floors; storage areas; hallways; conference rooms; break rooms; and other common areas. Work space does not include wall thickness; shafts; heating, ventilating, or air conditioning equipment spaces; mechanical or electrical spaces, or similar areas where employees do not normally have access.

Public Act 30 of 2019

Deadlines, Exemptions, and definitions

- Sec 413 (6) states:

An MLTS operator is exempt from providing the specific location of each communications device until the installation of a new MLTS after January 1, 2020 under this subsection if both of the following apply:

- (a) The building contains less than 20,000 square feet of work space.
- (b) The building contains fewer than 20 communications devices.

Public Act 30 of 2019

Deadlines, Exemptions, and definitions

- Sec 413 (9) states:

For separate buildings using 1 MLTS and containing a work space of more than 7,000 square feet, all located on a single floor and on a single contiguous property and having a common public street address, the MLTS operator shall identify the specific location of each communications device in each building, in addition to the street address and any unique building identifiers, if applicable. An MLTS operator is exempt from providing the specific location of each communications device until the installation of a new MLTS after January 1, 2020 under this subsection if both of the following apply:

- (a) The building contains less than 20,000 square feet of work space.
- (b) The building contains fewer than 20 communications devices.

Public Act 30 of 2019

Deadlines, Exemptions, and definitions

- Sec 413 (10) states:

For separate buildings using 1 MLTS and containing a total work space of more than 7,000 square feet on single floors on separate properties having different street addresses, the MLTS operator shall identify the specific location of each communications device in each building, including the street address and any unique building identifier, if applicable. An MLTS operator is exempt from providing the specific location of each communications device until the installation of a new MLTS after January 1, 2020 under this subsection if both of the following apply:

- (a) The building contains less than 20,000 square feet of work space.
- (b) The building contains fewer than 20 communications devices.

Public Act 30 of 2019

Deadlines, Exemptions, and definitions

- Sec 413 (12) states:

For a house of worship, as described by section 7s of the general property tax act, 1893 PA 206, MCL 211.7s, with a single building having its own street address with less than 20 communications devices, the MLTS operator shall identify, at a minimum, the street address. An MLTS operator is exempt from providing the specific location of each communications device until the installation of a new MLTS purchased after January 1, 2020. The exemption provided under this subsection does not extend to a school controlled by the house of worship at the same address.

Public Act 30 of 2019

Deadlines, Exemptions, and definitions

- Sec 413 (13) states:

For a house of worship, as described by section 7s of the general property tax act, 1893 PA 206, MCL 211.7s, with multiple buildings, using 1 MLTS, all located on a single contiguous property and having a common public street address with less than 20 communications devices, the MLTS operator shall identify, at a minimum, the street address and a unique building identifier. An MLTS operator is exempt from providing the specific location of each communications device until the installation of a new MLTS purchased after January 1, 2020. The exemption provided under this subsection does not extend to a school controlled by the house of worship at the same address.

Public Act 30 of 2019

Deadlines, Exemptions, and definitions

- Sec 413 (14) states:

For a house of worship, as described by section 7s of the general property tax act, 1893 PA 206, MCL 211.7s, with multiple buildings, using 1 MLTS, on separate properties having disparate street addresses, with less than 20 communications devices, the MLTS operator shall identify, at a minimum, the specific street address of the caller's location and a unique building identifier, if applicable. An MLTS operator is exempt from providing the specific location of each communications device until the installation of a new MLTS purchased after January 1, 2020. The exemption provided under this subsection does not extend to a school controlled by the house of worship at 1 of its addresses.

Public Act 30 of 2019

Deadlines, Exemptions, and definitions

- Sec 413 (15) states:

For a farm, as that term is defined in section 2 of the Michigan right to farm act, 1981 PA 93, MCL 286.472, with less than 20 communications devices located within 1 building, the MLTS operator shall identify the specific location of each communications device, including the street address. An MLTS operator is exempt from providing the specific location of each communications device until the installment of a new MLTS after January 1, 2020. For purposes of this act, a farm does not include a farm producing or selling any product or crop that is unable to be sold in interstate commerce.

Public Act 30 of 2019

Deadlines, Exemptions, and definitions

- Sec 413 (16) states:

An MLTS operator is exempt from the specific location identification requirements under this section if the building maintains, on a 24-hour basis, an alternative method of notification and adequate means of signaling and responding to emergencies including, but not limited to, a communications system that provides the specific location of 9-1-1 calls from within the building or the building is serviced with its own appropriate medical, fire, and security personnel.

Public Act 30 of 2019

Deadlines, Exemptions, and definitions

- Sec 413 (17) provides an exemption for a MLTS operator that is not serviced by E911.

Kari's Law – Direct outward dialing of 911 is not a State requirement, however, it is require under Federal law. Kari's Law requires MLTS equipment manufactured, imported, sold, leased, or installed after Feb. 16, 2020, to be capable of enabling users to dial 911 directly rather than having to dial a prefix.

Public Act 30 of 2019

Compliance and Deployment

- General rule of thumb for location/building mapping – Ask yourself, “If a caller used a device on the MLTS and could not speak, would an emergency responder be able to find them based on the information the system automatically provides?”
- Contact your local PSAP to ask questions about building mapping, proper routing, and final testing. A list of all the PSAPs in the state can be found at: www.michigan.gov/snc.
- The link to the current MLTS Guidelines and the flow chart are at:
- 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/MLTS_Flow_Chart_9-11-19_666215_7.pdf



Questions????

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