

ECS Compliance Determination & Waiver Process Information

1. PURPOSE

According to the Vermont Enhanced 9-1-1 Board Enterprise Communications Systems (ECS) Rule: *Rule Governing the 9-1-1 Requirements for Enterprise Communications Systems* (effective July 1, 2019) every ECS within the state must be compliant with the 9-1-1 regulations as defined in the rule. For the full text of the rule see: <https://e911.vermont.gov/statutes-and-rules/rules>.

The public expects that a 9-1-1 call made from any device anywhere in the state will be routed to the appropriate Public Safety Answering Point (PSAP) with accurate location information so that a dispatchable location can be provided to emergency responders.

2. SCOPE

In order to determine whether or not an ECS is compliant, 9-1-1 test calls must be scheduled with the 9-1-1 Board according to *ECS Compliance Testing Procedures*.

Section 3 – RESPONSIBILITIES/STEPS TO BE FOLLOWED outlines the steps which need to be taken leading up to, and including, the possible granting of a waiver.

3. RESPONSIBILITIES/STEPS TO BE FOLLOWED – *The following steps must be taken prior to, and inclusive of, the waiver process.*

- 1) TESTING - The company/entity or ECS provider schedules testing with the 9-1-1 Board following the ECS Compliant Testing Procedures.
- 2) DETERMINING COMPLIANCE - Board Staff reviews test results and determines compliance status.
- 3) COMPLIANT RESULTS NOTIFICATION - Board Staff sends a formal notification letter to the ECS technical contact and business manager advising of compliance testing results. No waiver request is needed.
- 4) NON-COMPLIANT RESULTS NOTIFICATION - Board staff sends a formal notification letter via email to the ECS technical contact and business manager explaining the specific reason for the non-compliant determination. Instructions shall be provided as to next steps necessary to achieve compliance. A copy of the Rule shall be attached to the email.
- 5) COMPANY/ENTITY RESPONSE REQUIRED AFTER NON-COMPLIANT RESULTS NOTIFICATION – The ECS technical contact or business manager must respond in writing to the Board within 30 days of a non-compliant test result notification with a plan of action to become compliant within 90 days. If their ECS can become compliant within 90 days, a waiver is not required. If they are not able to become compliant within 90 days, they will be instructed to apply for a Waiver (see Section 8 of the ECS rule). Board staff shall direct the ECS contact to the *ECS Compliance Waiver Request Form* (<https://e911.vermont.gov/WaiverRequestForm>).
- 6) WAIVER REVIEW BY COMMITTEE - Upon receipt of the waiver request Form, the Board's ECS Compliance Committee will meet as a group within 30 days to review the request for approval.
 - a. Approval by the Committee – If the request is approved, the Committee will advise the entity in writing of the conditions under which the waiver will be granted. This notification shall include the expiration date of the waiver.
 - b. Denial by Committee – If the request is denied, the Committee will notify the entity in writing of the decision with an explanation for the reasons behind the denial. This notification shall also include instructions as to what the entity must do to become eligible for a waiver.