

E911 Service Acknowledgment

VoIP 911/E911 Service Limitations and Acknowledgment

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1. What is VoIP 911/E911 Service?

Voice over Internet Protocol (VoIP) 911 service operates differently from traditional landline 911 service. When you place a 911 call using VoIP, your call is routed over the internet rather than through the traditional Public Switched Telephone Network (PSTN). Enhanced 911 (E911) service transmits your dispatchable location, which for fixed service is the validated street address on file plus any suite, apartment, or similar detail, to the local Public Safety Answering Point (PSAP) so that emergency responders can be dispatched to your location. However, this process is subject to technical limitations that do not apply to traditional landline 911 service.

It is critical that you understand these differences and take appropriate steps to ensure your safety and the safety of others at your service location.

2. Limitations of VoIP 911/E911 Service

The following limitations may affect the availability, reliability, or accuracy of VoIP 911/E911 service:

Power Outages: VoIP 911 service requires electrical power to operate. If there is a power outage, your VoIP service — including 911 — will not function unless you have a battery backup or uninterruptible power supply (UPS) that is charged and operational. Even with backup power, service will only last as long as the backup power source.

Internet Service Interruption: VoIP 911 requires an active internet connection. If your broadband service is disrupted for any reason — including network outages, maintenance, congestion, or service suspension — you will not be able to place 911 calls through your VoIP service.

Equipment Failure: If your VoIP adapter, router, modem, or any other equipment necessary for VoIP service malfunctions, is damaged, or is improperly configured, 911 service may be unavailable.

Incorrect/Outdated Address: Your registered service address is transmitted to the PSAP when you dial 911. If this address is incorrect, outdated, or incomplete, emergency responders may be dispatched to the wrong location. It is your responsibility to update your service address whenever you move your VoIP equipment to a new physical location.

Non-Native Telephone Numbers: If your telephone number is not native to the area where you use the service, your 911 call may not route to the PSAP that serves your physical location, and PSAP callback capability may be affected.

Address Update Delays: Updates to your registered service address are not instantaneous. There may be a delay before an updated address is available in or through the automatic location information (ALI) database used to route and deliver 911 calls. During that period, 911 calls may be routed or delivered based on your prior address.

Network Congestion: During periods of high network traffic, VoIP 911 calls may experience degraded quality, delayed connections, or may fail entirely. Unlike traditional landline service, VoIP calls compete with other internet traffic on your connection and across the broader network.

Non-Standard Configurations: If your VoIP service is used behind a firewall, through a VPN, with a proxy server, or in any other non-standard network configuration, 911 service may not function properly or at all.

Service Suspension/Termination: If your VoIP service is suspended or terminated for any reason — including non-payment, violation of terms, or voluntary cancellation — 911 service through your VoIP line will be unavailable.

Technology Limitations: VoIP 911 calls may not be routed to the PSAP nearest to your physical location. In some cases, calls may be routed to a national emergency call center. In areas that are not served by a wireline E911 network, a call may reach an administrative line rather than a local 911 dispatcher. Additionally, callback capabilities may be limited — if your call is disconnected, the PSAP may not be able to call you back.

3. Multi-Line Telephone Systems and Kari's Law

Kari's Law Compliance (47 U.S.C. § 623): Federal law requires that multi-line telephone systems (MLTS) manufactured, imported, offered for first sale or lease, first sold or leased, or installed after February 16, 2020, including PBX, Centrex, and hosted VoIP systems used in enterprises, hotels, and other multi-line environments, allow users to dial 911 directly without requiring a prefix, access code, or any additional digits.

Additionally, Kari's Law requires that when a 911 call is placed from an MLTS, a notification must be sent to a central location at the facility where the system is installed, or to another person or organization regardless of location, such as a front desk, a security office, or an off-site monitoring service. The notification must be initiated at the same time as the 911 call where that is technically feasible, must not delay the 911 call, and must be sent to a location where someone is likely to see or hear it. The notification requirement applies where the system can be configured to provide the notification without an improvement to its hardware or software. At a minimum, the notification must convey the fact that a 911 call has been made, a valid callback number, and the location information the system sends to the PSAP, unless it is technically infeasible to provide the callback number or the location.

Responsibility: If you install, manage, or operate your own MLTS or PBX system using Company-provided SIP trunking or hosted services, it is your responsibility to ensure that the system is configured for direct 911 dialing, on-site notification, and conveyance of dispatchable location to the PSAP, as required by federal law. Dispatchable location is a separate obligation of the person who installs, manages, or operates the system. It is not discharged by direct dialing and notification alone. Where the Company installs, manages, or operates your MLTS, the Company will configure that system to meet those requirements, subject to your service agreement. The Company does not manage or operate a system that it does not install, manage, or operate, and supplying SIP trunking or hosted services alone does not make the Company the manager or operator of your system.

State Law: State and local law may impose 911 dialing, notification, or location requirements on multi-line telephone systems that are broader than federal law, and those requirements may reach systems installed on or before February 16, 2020. In Texas, a business service user that owns or controls a telephone system providing outbound dialing must configure the system to allow a person to directly access 9-1-1 by dialing the digits 9-1-1, without an additional code, digit, prefix, postfix, or trunk-access code. Texas imposes that duty regardless of when the system was installed, and compliance has been required since September 1, 2016. Texas also requires notification to a central location on site when a person dials 9-1-1, unless the system cannot be configured to provide the notification without an improvement to the system hardware. A one-year waiver is available from the applicable Texas 9-1-1 authority where compliance would be unduly and unreasonably cost prohibitive, on an annual affidavit and on posting an instructional sticker at each noncompliant telephone handset. Within a Texas emergency communication district, a business service user whose system was installed on or after September 1, 2003 and consolidates telephone service across two or more physical addresses must provide 9-1-1 service that identifies an accurate physical address and telephone number for each call, and each floor of a multitenant building counts as a separate physical address. A hotel, motel, or similar lodging facility that does not operate a 24-hour on-site telephone operator must use a system that furnishes the telephone number and location of the individual unit from which the call is placed. In Oregon, the operator of a multi-line telephone system installed at least 12 months after January 1, 2014 must supply information that allows the public safety answering point to obtain an emergency response location that includes at least the street address and building name for the place from which the call originates. That duty does not reach a workplace of less than 10,000 square feet on a single level on one tract of land. Where an Oregon system requires a prefix to place an outgoing call, the manager must make a diligent effort to ensure that users know how to reach 911. In Colorado, installers, managers, and operators of multi-line telephone systems must meet the requirements of federal law, including Kari's Law, as a matter of Colorado law, and the state maintains a mechanism for the public to report violations. If you use your system to furnish telephone service to businesses that are not affiliated with you, further duties may apply to you. In Texas, you must give those end users the same level of 9-1-1 service that the service supplier provides to other business end users in the district. In Washington, a provider of private shared telecommunications services serving multiple unaffiliated business users from a single system must assure that 911 calls

result in automatic location identification for each telephone, in a format compatible with the county enhanced 911 system, where the premises exceed 25,000 square feet, span more than one floor, or occupy multiple buildings. You remain responsible for compliance with the requirements applicable at your location.

4. Dispatchable Location — RAY BAUM'S Act

Under FCC rules adopted following Section 506 of RAY BAUM'S Act, the Company must provide automated dispatchable location with each 911 call placed over fixed interconnected VoIP service. A dispatchable location is the validated street address of the calling party, plus additional information such as suite, apartment, or similar information necessary to adequately identify the caller's location. For non-fixed service, meaning service that is capable of being used from more than one location, and for devices associated with a multi-line telephone system, the rules permit alternative methods of supplying location information. Those methods are described below. Which method applies to you turns on whether your service is fixed or non-fixed, not on whether you are a residential or a business customer.

- (a) Fixed Service: For fixed interconnected VoIP service, the registered service address on file with the Company will be transmitted as your dispatchable location. This address must be current and accurate at all times.
- (b) Enterprise and Multi-Floor Locations: For enterprise customers with multi-floor or multi-zone locations, dispatchable location information must include sufficient detail to identify the specific floor, suite, room, or zone from which the 911 call originates. Each endpoint or device must be associated with location information at a granularity that allows emergency responders to locate the caller.
- (c) Softphone and Mobile VoIP Users: If you use a softphone application or mobile VoIP client, automated dispatchable location may not be available for your device. Where automated dispatchable location is not provided, you must manually update your location information whenever you change physical locations. Location updates can be made through Company's voice portal or by contacting Company at help@corefiber.com or 855-267-3342. Failure to update your location may result in emergency responders being dispatched to an incorrect address.

5. Your Responsibilities

As a customer using VoIP 911/E911 service, you are responsible for the following:

- Keep your registered service address current and accurate at all times. Update your address immediately if you move your VoIP equipment to a new location.
- Inform all persons who may use or be present at the location where your VoIP service is used about the limitations of VoIP 911 service described in this document.
- Maintain an alternative means of accessing 911 service (such as a traditional landline, mobile phone, or nearby phone) in case VoIP 911 is unavailable.

- Place the 911 advisory sticker provided by the Company on or near each VoIP device at your service location.

6. Company's Obligations

The Core Fiber company that provides your interconnected VoIP service, as identified on your order or invoice (the "Company"), will comply with applicable federal and state 911 regulations and in doing so will use reasonable and prudent efforts to provide reliable E911 service. Specifically, the Company will:

- Maintain connections to E911 service providers and PSAPs as required by applicable law.
- Transmit all 911 calls, your callback number, and dispatchable location information, which for fixed service is automated, to the appropriate PSAP when a 911 call is placed.
- Where the service can be used from more than one location and the Company relies on your registered location, provide you with one or more ways to update that location, including at least one option that uses only the equipment needed for the service, and identify calls placed from a location other than your registered location so that the location can be confirmed or updated.
- Provide 911 advisory labels and stickers for placement on or near VoIP equipment.
- Use commercially reasonable efforts to notify customers of significant changes to 911 service capabilities or routing.

7. Acknowledgment

BY ACCEPTING THE AGREEMENT DESCRIBED IN SECTION 1 OF THE CORE FIBER GENERAL TERMS AND CONDITIONS, OR BY ENROLLING IN, ACTIVATING, USING, OR PAYING FOR VOIP SERVICE, YOU ACKNOWLEDGE THAT YOU HAVE RECEIVED AND UNDERSTAND THE 911/E911 LIMITATIONS DESCRIBED IN THIS DOCUMENT AND CONFIRM THE FOLLOWING:

1. I HAVE READ AND UNDERSTAND THE LIMITATIONS OF VOIP 911/E911 SERVICE as described in this document, including the risks associated with power outages, internet disruptions, equipment failure, use of a telephone number that is not native to my area, delays in making an updated address available in or through the ALI database, and incorrect address information.

2. I UNDERSTAND THAT VOIP 911 MAY NOT FUNCTION during power outages, internet service interruptions, or equipment failures, and that I should maintain an alternative means of contacting emergency services.

3. I HAVE PROVIDED MY CORRECT SERVICE ADDRESS and agree to update it immediately if I relocate my VoIP equipment.

4. I AGREE TO INFORM ALL USERS AND OCCUPANTS at my service location about the limitations of VoIP 911 service.

5. I AGREE TO PLACE THE PROVIDED 911 ADVISORY STICKER on or near each VoIP device at my service location.

6. I UNDERSTAND MLTS DIRECT DIALING REQUIREMENTS under Kari's Law and applicable state law, including the requirement for direct 911 dialing without a prefix, on-site notification, and conveyance of dispatchable location, and accept responsibility for compliance where I install, manage, or operate my own multi-line telephone system.

7. I UNDERSTAND SOFTPHONE AND MOBILE VOIP LOCATION REQUIREMENTS and agree to manually update my dispatchable location where automated dispatchable location is not provided for my device, whenever I use a softphone or mobile VoIP application at a different physical location.

Ref. 47 C.F.R. §§ 9.11, 9.15–9.17.

Questions about 911/E911 service: help@corefiber.com | 855-267-3342 | Core Fiber, 4015 S Lincoln Ave, Suite 500, Loveland, CO 80537. This document is posted at corefiber.com/legal.