

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)
)
Amendment of the Commission’s Rules) WT Docket No. 07-250
Governing Hearing Aid-Compatible Mobile)
Handsets)

To: The Commission

**REPLY COMMENTS OF THE
TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

The Telecommunications Industry Association (TIA) submits brief reply comments to the Federal Communications Commission (Commission) in the above captioned proceeding.¹ TIA is supportive of the Commission’s proposal to adopt ANSI C63.19:2011, the most current version of the hearing aid compatibility standard (HAC) for wireless devices. TIA submits these reply comments to note unanimous support on the record for the adoption of ANSI C63.19:2011, and to emphasize its support for an appropriate phase-in period – specifically, two years – that will help ensure that technological and market feasibility principles are incorporated most effectively into the Commission’s rules, further the Commission’s HAC objectives.

¹ In the Matter of Amendment of the Commission’s Rules Governing Hearing Aid-Compatible Mobile Handsets, *Second Further Notice of Proposed Rulemaking*, WT Docket No. 07-250 (rel. Nov. 1, 2011) (FNPRM).

I. THE RECORD SUPPORTS THAT THE COMMISSION ADOPT THE NEW STANDARD, AND INCORPORATE REASONABLENESS AND FEASIBILITY PRINCIPLES INTO ITS PHASE-IN PERIOD.

TIA notes that the record shows unanimous support for the adoption of the 2011 ANSI Standard into the Commission's rules as an applicable technical standard for evaluating the HAC of wireless phones.² We file these brief reply comments to emphasize to the Commission the need for incorporation of marketplace and technical feasibility principles into the implementation phase-in period for the new standard.

While the record demonstrates industry support for a two year phase-in period,³ others lend support to a 12 month phase-in period.⁴ Proposals for the shorter phase-in do not fully take into account marketplace realities and product cycles noted on the record in this matter,⁵ or the absolutely critical fact that Office of Engineering and Technology (OET) laboratory testing guidance must be developed and released as quickly as possible to successfully implement the

² See Comments of the Hearing Loss Association of America (HLAA), the Association of Late Deafened Adults, Inc. (ALDA), Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), National Association of the Deaf (NAD), Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN), and Hands & Voices, the Rehabilitation Engineering Research Center on Telecommunications Access (RERC-TA), WT Docket No. 10-254 (filed Jan. 12, 2012) (Consumer Groups and RERC-TA Comments) at 1; Comments of the Hearing Industries Association (HIA), WT Docket No. 10-254 (filed Jan. 13, 2012) (HIA Comments) at 1; Comments of CTIA – The Wireless Association® (CTIA), WT Docket No. 10-254 (filed Jan. 13, 2012) (CTIA Comments) at 4; Comments of the Telecommunications Industry Association (TIA), WT Docket No. 10-254 (filed Jan. 13, 2012) (TIA Comments) at 3; Comments of Samsung Telecommunications America, LLC (Samsung), WT Docket No. 10-254 (filed Jan. 13, 2012) (Samsung Comments) at 2; Comments of Sprint Nextel Corporation, WT Docket No. 10-254 (filed Jan. 13, 2012) (Sprint Comments) at 1.

³ See CTIA Comments at 8-9; TIA Comments at 4-5; Sprint Comments at 1.

⁴ See Consumer Groups and RERC-TA Comments at 2; HIA Comments at 2-3.

⁵ See, e.g., CTIA Comments at 8-9; TIA Comments at 4-5.

new standard.⁶ The 2011 update to the standard *is* significant⁷ – it expands the reach of the HAC to 698 MHz - 6 GHz as well as incorporates the use of the Modulation Interference Factor (MIF),⁸ a new measurement method that may be difficult to measure due to a lack of proliferation of appropriate equipment in testing labs, among other changes. Manufacturers do not take such changes lightly, and require more than 12-15 month period to ensure that the most efficient implementation occurs, with testing guidance as quickly as possible. We again urge the Commission to incorporate technical feasibility and reasonableness principles into its decisions in this matter, and allow a two year phase-in period.

⁶ *See, e.g.*, TIA Comments at 3; Samsung Comments at 4-5 (noting that “...the availability of TCB guidelines will be a gating factor with respect to the use of the 2011 Standard by manufacturers.”)

⁷ TIA disagrees with proponents of a 12-15 month phase-in period, which refer to the changes in the 2011 standard as “not dramatic.” *See* Consumer Groups and RERC-TA Comments at 2.

⁸ FNPRM at ¶ 3.

II. CONCLUSION

For the foregoing reasons, TIA urges the Commission's proposal to adopt ANSI C63.19:2011, the most current version of the hearing aid compatibility standard (HAC) for wireless devices, and to allow manufacturers and service providers a two year phase-in period for the implementation of this standard, consistent with the recommendations above.

Respectfully submitted,

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