

October 17th, 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Ex Parte Notice, *Amendment of the Commission's Rules Governing Hearing Aid-Compatible Mobile Handsets*, WT Docket No. 07-250

Dear Ms. Dortch,

On Monday, October 16th, and Tuesday, October 17th, 2017, a representative of the Telecommunications Industry Association (“TIA”) held separate meetings concerning issues in the above-referenced docket with the following: (1) Karen Peltz Strauss, Deputy Chief, Consumer and Governmental Affairs Bureau; Robert Aldrich, Front Office Legal Advisor; Susan Bahr, Attorney Advisor, Disability Rights Office; (2) Jamie Susskind, Chief of Staff and Legal Advisor, Office of Commissioner Carr; (3) Holly Sauer, Acting Legal Advisor, Office of Commissioner Rosenworcel; (4) Erin McGrath, Legal Advisor, Office of Commissioner O’Rielly; (5) Michael Carowitz, Special Counsel, Office of the Chairman; and (6) Louis Peraertz, Senior Legal Advisor, Office of Commissioner Clyburn.

During these meetings, TIA raised concerns regarding language in Section C, “Volume Control in Wireless Handsets” and its potential implications on the consensus proposal adopted by the Commission in August 2016.¹ While the TIA-PN-5050 standard was designed to be a voluntary, consensus-based industry standard, TIA understands that volume control is an important issue for the hearing loss community. Given that the Commission intends “rather than relying on a government-mandated technical solution,” to “adopt a general volume control requirement” in order to mitigate “any costs associated with meeting certain levels of volume control in wireless handsets,” TIA suggests that the focus of the requirement should remain tied to desired outcomes and any unnecessary process language, such as that in paragraph 41 “volume control functional components,” should be removed. Such technical, process-based language, could lead to the development of too rigid a framework for the Commission’s assessment of volume control standards going forward, which may forestall new or alternative approaches to achieving volume control in wireless handsets.

TIA appreciates the Commission’s dedication to improving communications services and availability within the disability community. TIA and its members are likewise committed to promoting the availability of communications wherever possible and look forward to continued engagement through the Consensus Proposal process.

¹ *Improvements to Benchmarks and Related Requirements Governing Hearing Aid-Compatible Mobile Handsets*, Report and Order, 31 FCC Rcd 9336 (2016) (2016 Wireless HAC Order).

Respectfully submitted,

Telecommunications Industry Association

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Cc: Karen Peltz Strauss, Robert Aldrich, Susan Bahr, Jamie Susskind, Holly Sauer, Erin McGrath, Michael Carowitz, and Louis Peraertz