

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Revisions to Reporting Requirements Governing) WT Docket No. 17-228
Hearing Aid-Compatible Mobile Handsets)

REPLY COMMENTS OF PTI PACIFICA INC. DBA IT&E

PTI Pacifica Inc. ("PTI"), doing business as IT&E, submits these reply comments in response to the comments in the above-captioned notice of proposed rulemaking proceeding.¹

The *Notice* seeks comment on whether the benefits of requiring an annual FCC Form 655 hearing aid-compatibility ("HAC") status report filing by small, rural, and regional service providers continue to outweigh the burdens this information collection places on these entities.²

PTI is a Tier III provider of wireless telecommunications services in the Pacific Ocean insular territories of Guam and the Commonwealth of the Northern Mariana Islands ("CNMI"). As one of the small wireless carriers to which the *Notice* is directed, PTI strongly supports elimination of the annual HAC reporting requirement for non-nationwide carriers.

As two different coalitions of Tier III carriers explain,³ the estimate in the Form 655 instructions that the average burden of completing the report is just 2.5 hours annually is way off base. The Form 655 requires detailed monthly recordkeeping, requiring a time commitment far

¹ See *Revisions to Reporting Requirements Governing Hearing Aid-Compatible Mobile Handsets*, Notice of Proposed Rulemaking, WT Docket No. 17-228, FCC 17-123 (Sept. 27, 2017) ("*Notice*").

² *Id.* at ¶ 2

³ Comments of the Rural Wireless Association, Inc., WT Docket No. 17-228, at 1-2 (Nov. 13, 2017) ("RWA Comments"); Comments of the Blooston Rural Carriers, WT Docket No. 17-228, at 2 (Nov. 13, 2017) ("Blooston Comments").

in excess of the Commission's estimate.⁴ As a small carrier offering service over several air interfaces, PTI reported on 62 handsets in 2016, which is more than two of the Tier I nationwide carriers reported on; yet PTI has relatively few customers over which to spread those reporting and recordkeeping costs.⁵ For Tier III carriers with only a fraction of the employees of the nationwide service providers, eliminating the annual HAC reporting burden will have a measurable impact and will ensure that wireless services remain available to consumers in remote markets like CNMI and Guam.

Moreover, as the initial comments describe,⁶ consumers today can obtain information about HAC-compliant handsets from numerous sources. The record demonstrates that the public interest would be far better served if resources that smaller carriers currently use for recordkeeping and preparing annual HAC reports could instead be available for improving the quality of advanced wireless services and expanding network coverage for all consumers.

By: /s/ Steven Carrara
Steven Carrara
General Counsel
PTI Pacifica Inc.
P.O. Box 500306
Saipan, MP 96950
Steven.Carrara@itehq.net

November 27, 2017

⁴ See also AT&T Comments at 6 ("Compiling and submitting this information for the HAC status reports alone take multiples of the two and a half (2.5) hours, on average, that the Form 655 Instructions estimate it would take to compile this information."); Comments of CTIA and Competitive Carriers Association, WT Docket No. 17-228, at 8 (Nov. 13, 2017) ("CTIA/CCA Comments").

⁵ The 2010 population of Guam was 180,685 and of the CNMI was 48,317.

⁶ CTIA/CCA Comments at 3.