

RECEIVED

AUG - 1 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

In the Matter of)
)
Request for Petition for Rulemaking)
of HEAR-IT NOW to Amend Section)
68.4 (a) of the Commission's Rules)
Hearing Aid - Compatible Telephones)

RM - 8658

DOCKET FILE COPY ORIGINAL

ADDITIONAL COMMENTS ON PETITION FOR RULEMAKING

Hearing Industries Association
515 King Street, Suite 420
Alexandria, Virginia 22314
(703) 684-5744

No. of Copies rec'd 0+10
List A B C D E CCB

August 1, 1995

Office of the Secretary
Federal Communications Commission
1919 M Street, NW, RM. 222
Washington, DC 20554

**RE: ADDITIONAL COMMENTS OF THE HEARING
INDUSTRIES ASSOCIATION
REGARDING HEAR-IT NOW'S
PETITION FOR RULEMAKING TO
AMEND SECTION 68.4 (A) OF THE
COMMISSION'S RULES HEARING
AID-COMPATIBLE TELEPHONES**

The Hearing Industries Association ("HIA") appreciates the opportunity to submit additional comments to the Commission regarding HEAR-IT NOW's request for the issuance of a Petition for Rule Making to amend Section 68.4 (a) of the Commission's Rules, 47 C.F.R. § 68.4 (a), to specify that broad band Personal Communication System (PCS) devices capable of voice transmission or reception must be hearing aid compatible.

HIA is a trade organization that represents hearing aid and component manufacturers. HIA members collectively manufacture over 90% of the hearing aids sold in the United States. HIA members export hearing aids to Europe and the rest of the world. HIA is participating in the FCC comment process because of its significant interest in HEAR-IT NOW's petition. Consistent with its interest regarding the interference technologies present to hearing aids, HIA is currently involved in studies at the University of Oklahoma evaluating this issue.

Having reviewed the FCC comments, HIA believes that it is necessary to clarify the record because inconsistent information regarding several factual issues has been submitted to the Commission. Accordingly, HIA respectfully submits the following information which has been derived from various sources:

1. The industry consensus on the average life span of a hearing aid is five years (HIA survey data of member companies).
2. There are currently about 111 FDA registered manufacturers of hearing aids in the United States (US Food and Drug Administration). Importantly, 39 companies that participate in the HIA Quarterly Statistical Program produce over 95% of the hearing aids manufactured in the US on an annual basis.
3. The number of Americans with a hearing impairment is 25.8 million. Currently, 5.8 million Americans own a hearing aid. (source: Kochkin, Sergei, Ph.D., MarkeTrac III: US Hearing Instrument Market (1991)).
4. Currently, the hearing aid with the fastest increasing market share is the completely-in-the-canal (CIC) model (HIA quarterly sales statistics). Industry consensus of HIA members is that the CIC may make up 20% of the market by the year 2000 (HIA survey data of member companies).
5. During preliminary informal demonstrations, conducted by HIA member company engineers, different types of hearing aids were exposed to GSM and CDMA technologies set at power levels representative of probable US operational levels. Interference, in some cases extreme, was observed. Technical representatives of both PCS technologies were present for the experiment. There was general agreement among engineers from HIA member companies that the more technologically advanced types of hearing aids, e.g. CIC's, were most vulnerable to interference.
6. Because of the smaller size and electronic composition of modern hearing aids, shielding the device with a "metallic paint" is not a viable solution. Placed near the operating system, metal based shielding can cause various electronic problems impeding operation of the device for its intended purpose.

HIA, in its review of the record, notes that significant reliance has been placed on the European experience. However, it is commonly known that the market share by type of hearing aid in Europe is substantially different from the profile in the United States. HIA respectfully requests that the comment period remain open to the limited extent that the FCC will accept a comparative study of hearing aid types sold in Europe compared with those sold in the US. HIA expects to receive the study from its European counterpart within the next three weeks and would submit it to the FCC record no later than August 25, 1995.

Respectfully submitted.



Carole M. Rogin

President

Hearing Industries Association

Hearing Industries Association
515 King Street, Suite 420
Alexandria, Virginia 22314
(703) 684-5744