



TELECOMMUNICATIONS
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Via Electronic Filing

July 22, 2015

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte Letter – Request For Updated Information And Comment on Wireless Hearing Aid Compatibility Regulations, WT Docket Nos. 07-250, 10-254*

Dear Ms. Dortch:

The Telecommunications Industry Association (“TIA”) files this letter to supplement the record in this proceeding by summarizing the results of recent engagements by TIA at the 2015 Hearing Loss Association of America (“HLAA”) convention with consumers with hearing loss about their experience with hearing aid compatibility (“HAC”) for wireless handsets. This letter outlines the points addressed in TIA’s presentation, provides details on the findings from our informal survey of attendees, and summarizes some important insights from the discussion with consumers.

On June 26, 2015, TIA hosted a session entitled “Making an Informed Decision When Purchasing a Hearing Aid Compatible Mobile Handset”¹ for conference attendees at the 2015 HLAA convention, which included panelists representing a variety of wireless handset manufacturers.² The session enabled manufacturers and consumers with hearing loss to have a dialogue about wireless hearing aid compatibility, specifically how manufacturers design HAC-rated mobile, wireless handsets and the consumer experience with purchasing and using these devices. During the session, panelists provided information about how the HAC rating system for wireless mobile handsets works and the role mobile handsets play as one part of the binary system; manufacturer considerations when designing for HAC; and items and resources consumers should consider to aid their purchasing decisions for hearing aids as well as wireless handsets.

In addition, TIA session panelists’ conversation with attendees revealed that consumers generally are not having a hard time finding HAC-rated mobile phones; no one identified this as a concern.

¹ http://eventmobi.com/api/events/7579/documents/download/1b7a4a02-281c-4b0f-b761-68b41a5b5cd8.pdf/as/Bell,%20Avonne%20-%20TIA%20Presentation%20HLAA%202015_Final.pdf

² http://hearingloss.org/sites/default/files/docs/2015WorkshopSchedule_Friday.pdf



An informal poll of the participants (see Table 1) found that everyone polled had a wireless mobile phone. While a majority of those with hearing loss indicated that they had trouble with the way their phone works with their hearing device, interference, the issue that is addressed by the C63.19 HAC standard, recognized through buzzing sounds was flagged by only one person as an issue. Instead, the most commonly identified issue for consumers with hearing loss was that the speech is not intelligible, or clear, *not issues associated with electromagnetic interference*. Thus, it was apparent that the root cause of the large majority of consumers’ usability issues was not HAC. One attendee specifically stood up and thanked panelists for explaining the HAC rating system because he never realized before that it dealt with interference levels, not clarity. Some attendees (consumers with hearing loss as well as audiologists) also raised issues about the ability to get accurate information about the immunity rating of their hearing aids as this information is usually not published or made easily available.

Poll at HLAA Convention TIA Panel	
Question	Response
How many of you have a mobile wireless phone?	100% (50+ people)
How many have trouble with your phone and hearing device?	67% (about 33 people)
Is it because the phone is just not loud enough ?	4% (two people)
Is it because of an interference buzzing that happens when you hold the phone near your hearing aid?	2% (one person)
Is it because the words are not clear enough ?	60% (about 30 people)
CONCLUSION: The big issue is not volume or interference. The overwhelming issue is clarity which is not addressed by the FCC’s HAC standard.	

Table 1: Results of Informal Survey of TIA Session Attendees at 2015 HLAA Convention

These survey findings, while informal, provide crucial insight into the consumer experience with HAC and what regulatory solutions may be needed. The Federal Communications Commission’s (“Commission”) proposal to mandate 100 percent HAC certification across every model sold in the United States³ seems to be predicated on the idea that consumers with hearing

³ See Request for Updated Information and Comment on Wireless Hearing Aid Compatibility Regulations, Public Notice, WT Docket No. 07-250, 10-254, DA 14-1688 (rel. Nov. 21, 2014).



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aids are having a bad experience with their wireless mobile phones because there are not enough HAC-compliant devices available. However, as TIA has previously stated in its filings with the Commission⁴, the percentage of wireless CMRS HAC-rated phones available, as of July 2014, is 82% for M-rating and 66% for T-rating, demonstrating that manufacturers continue to take considerable steps to incorporate HAC into the design of their wireless handsets, to the extent feasible. Thus, when combined with the information gleaned from our conversation with consumers, these statistics strongly support the conclusion that lack of access to, or availability of, HAC-rated wireless handsets is not a critical issue in addressing usability of wireless handsets for hard of hearing consumers.

Consequently, this letter demonstrates that more information is needed to determine the proper context and scope of any problems consumers with hearing loss may be experiencing with respect to mobile wireless handsets. It further highlights the need for the Commission to engage in a rulemaking proceeding before pursuing any changes to the existing wireless HAC regulatory framework in order to develop a more complete record with comprehensive consideration of the entire wireless HAC ecosystem, the specific issues or concerns that consumers are experiencing, and the most effective mechanism for addressing these needs and ensuring consumers with hearing loss continue to have access to the most advanced communications products available. To achieve the goal of ensuring that new products and services are accessible to people with hearing loss, it is important to understand with technical specificity where the issues the Commission is concerned with lie.

TIA and its members thank the Commission staff for its continued engagement with stakeholders on this issue and we stand ready to work with the Commission on finding the most appropriate regulatory solution.

Respectfully submitted,

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⁴ See Comments of TIA, WT Docket Nos. 07-250, 10-254 (filed Feb. 5, 2015) at 4; *Ex Parte* Notice of TIA, WT Docket Nos. 07-250, 10-254 (filed June 24, 2015) at 1.