



The Nation's Voice for People with Hearing Loss

Via electronic filing

September 15, 2015
Marlene H. Dortch, Secretary
Federal Communications Commission
444 Twelfth Street, SW
Washington, DC 20554

Re: Ex parte meeting: Comments on Wireless Hearing Aid compatibility Regulations, WT
Docket Nos. 07-250, 10-254

Dear Ms. Dortch,

Lise Hamlin of Hearing Loss Association of America (HLAA) and Linda Kozma-Spytek and Stephen Julstrom (by phone) of the Deaf/Hard of Hearing Technology RERC at Gallaudet met on September 8, 2015 with FCC representatives Karen Peltz Straus, CGB, Robert Aldrich, CGB, Chad Breckinridge, WTB, Peter Trachtenberg, WTB, Patrick Forster, OET, Bill Stafford, WTB and Eli Johnson, WTB.

HLAA raised objections to TIA's filing of July 22, 2015 regarding their "survey" which took place at the HLAA convention in June. HLAA has significant concerns about the way in which the "survey" was conducted, the way in which the questions are reported in the filing and the generalizations made based on what are reported as the findings of this "survey." Their "informal survey" was, in fact, a show of hands to questions posed by a presenter at an HLAA convention session. The presenter did not frame these questions as a survey nor did they inform the audience how their responses would be used. The presenters had no way of knowing what a lack of response (hand raising) by individuals in the audience might mean. In addition, the questions they reported asking in their filing do not match in all cases the questions actually asked of the audience. For example, the presenter asks: "How many would say it's because when you hold your phone up to your ear, there's a nasty buzzing sound that happens?" but the filing states that the question asked was: "Is it because of an interference buzzing that happens when you hold the phone near your hearing aid?" The addition of the word "nasty" qualifies the "buzzing sound" and substantially changes the nature of the question asked from what has been reported. Likewise, the question asked regarding the loudness of the phone is really two questions in one because the audience is asked whether the difficulty is because 1) it's just not loud enough? 2) you just can't hear? Speech not being loud enough and speech you just can't hear are two different things. Given this, it is not possible to know which question the audience is answering with their show of hands. The problems outlined make it difficult to interpret the show of hands reported in the filing and obviate any ability to generalize the information to a larger population.

Also discussed were two items regarding HAC Wireless phones. HLAA noted that we have long sought the goal of reaching 100% hearing aid compatible wireless devices so that all consumers have the full benefit of the range of wireless phones available. This goal has not changed. HLAA confirmed that we are willing to continue to work with Industry to reach that goal in the near term. We discussed the possibility of convening a working group to solve remaining

technical issues. However, we indicate that we do not want any meeting or meetings to be used as an excuse to delay innovations that would result in more HAC phones on the market. We also stressed the need to work not only with Industry's policy representatives, but the engineers or other technical representatives with the background and experience to address and solve the remaining problems. In the same way the ATIS working group on wireless phone resulted in significant progress, we expect a similar working group would move to ensure that the goal 100% HAC wireless devices on the market can be reached in the near future.

We also stated that we believe that the current C63.19 standard seems to be valid for testing wireless HAC and providing phones that do work for consumers. We also believe standards should be reviewed from time to time and updated as necessary, not only to ensure that they continue to be effective, but also to ensure their efficiency so that they are not needlessly cumbersome to Industry. There is currently new data and information available in both these areas from a study completed by the Hearing Enhancement RERC in cooperation with the FDA that could inform a review of the current version of the C63.19 standard for effectiveness and efficiency.

It's our understanding that the Industry believes that delaying a HAC rating on a product by several months after it arrives on market would allow more products to reach market quickly while at the same time providing HAC phones needed. We are unsure that this would work. It's our understanding that there are testing methods to determine interference potential early on in the development process. If that is the case, why not continue to develop products with low interference potential? It's not clear delaying the product will result in a phone that arrives on market and is later rated for HAC or retrofitted to be HAC. We oppose the proposition of people with hearing loss who need these phones to be treated as second class citizens. We also oppose any procedure that makes it more difficult to bring HAC wireless phones to market, or end up creating fewer HAC wireless phones and devices.

Volume control for wireless devices was discussed briefly. Understanding the use case of individuals with hearing devices when they hold their wireless devices to their ears is important for achieving the acoustic signal level requirements of these users. There is already some information, data and wireline standards work that could inform this issue.

Sincerely,

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