

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Improvements to Benchmarks and Related Requirements Governing Hearing Aid- Compatible Mobile Handsets	)	WT Docket No. 15-285
	)	
Amendment of the Commission’s Rules Governing Hearing Aid-Compatible Mobile Handsets	)	WT Docket No. 07-250
	)	

To: The Commission

**JOINT REQUEST FOR EXTENSION OF TIME TO FILE COMMENTS**

The Law Firm of Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP (BloostonLaw) and the Rural Wireless Association, Inc. (RWA) hereby respectfully request a brief extension of both the comment and reply deadlines in the above-captioned proceeding concerning the modernization and improvement of its hearing aid compatibility (HAC) rules and procedures.<sup>1</sup> In this regard, the *HAC NPRM* establishes Thursday, January 14, 2016, as the deadline for initial comments. However, as the Commission can take official notice, this initial comment deadline falls just one day before CMRS service providers (including many Tier III service providers) are required to submit annual HAC reports for the 2015 reporting period.

The proximity of these deadlines means that attorneys and service provider staff who are the most knowledgeable about intricacies of the Commission’s HAC reporting and regulatory compliance procedures (and therefore best positioned to draft informative comments) will be immersed in preparing and filing service provider HAC reports when the *HAC NPRM* comments are due. Because of the complexity of the HAC rules and the significant

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<sup>1</sup> See In the Matter of Improvements to Benchmarks and Related Requirements Governing Hearing Aid-Compatible Mobile Handsets, *Fourth Report and Order and Notice of Proposed Rulemaking*, FCC 15-155, WT Dockets No. 15-285 and 07-250, (rel. Nov. 20, 2015) (“*HAC NPRM*”).

consequences of filing a late or incomplete HAC report, BloostonLaw and RWA respectfully submit it is not in the public interest to create these conflicting time demands. In addition, setting the comment deadline a day before the reporting deadline will tend to deprive the Commission and the public of the benefit of comments based on experiences encountered by service providers and counsel during the HAC reporting window that ends on January 15, 2015.

A brief extension of the deadline for initial and reply comments will have no negative consequences and will only help to ensure that the record in this proceeding is more comprehensive. Accordingly, it is respectfully requested that the Commission extend the initial deadline to February 15, 2016 (i.e., past the February 9 short form deadline for Auction No. 1002, in which many wireless carriers subject to the HAC requirements will be participating); or if the Commission is unable to extend the deadline that far, then it should at a minimum be reset for a date that is at least 7 days after the January 15, 2016 HAC reporting deadline. The reply comment deadline should be adjusted in corresponding fashion.

Respectfully submitted,

**BLOOSTON, MORDKOFKY, DICKENS,  
DUFFY & PRENDERGAST**

**RURAL WIRELESS ASSOCIATION, INC.**



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By: John A. Prendergast  
D. Cary Mitchell  
Blooston, Mordkofsky, Dickens,  
Duffy & Prendergast, LLP  
2120 L Street, NW, Suite 300  
Washington, DC 20037  
Tel. (202) 659-0830

*/s/ Erin P. Fitzgerald*

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By: Erin P. Fitzgerald  
Regulatory Counsel  
Rural Wireless Association, Inc.  
P.O. Box 50551  
Arlington, VA 22205-5551  
(202) 551-0060  
legal@ruralwireless.org

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