

**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
)	
)	

**COMMENTS
OF
AMERICAN NATIONAL STANDARDS INSTITUTE
ACCREDITED STANDARDS COMMITTEE C63[®] SUBCOMMITTEE 8**

ANSI ASC C63[®] subcommittee 8 is pleased to offer these comments in response to The Commission' Fourth Report And Order And Notice Of Proposed Rulemaking, released on November 20, 2015.¹

ANSI ASC C63[®] is the accredited standard development organization responsible for developing and maintaining ANSI C63.19, *American National Standard Methods of Measurement of Compatibility between Wireless Communications Devices and Hearing Aids*. Within ANSI ASC C63[®] subcommittee 8 is responsible for ANSI C63.19 and in this role offers these comments.

¹ *Improvements to Benchmarks and Related Requirements Governing Hearing Aid-Compatible Mobile Handsets; Amendment of the Commission's Rules Governing Hearing Aid-Compatible Mobile Handsets*, Fourth Report and Order and Notice of Proposed Rulemaking, WT Docket Nos. 15-285 and 07-250 (rel. Nov. 20, 2015) ("NPRM").

Most recently, ANSI ASC C63[®] published the 2011 version of the ANSI C63.19 standard (which is the 4th revision of this standard). Each new version has been issued in response to the changing technologies, feedback on user experience and our growing insight into the issues related to hearing aid compatibility and techniques that are effective in bringing improvement. We are pleased that the Commission has adopted the 2011 ANSI C63.19 Standard into its Part 20 Rules and naturally support the continued use of this standard.²

We join the broad consensus that supports hearing aid compatibility as sound public policy. Enabling hearing aid wearers to use their mobile handsets not only improves their lives but results in their more fully participating and contributing to society. The combined contribution of hearing aid wearers to society brings enormous benefits to everyone. We accordingly support any efforts that advance hearing aid compatibility.

It is the responsibility of subcommittee 8 to monitor the standards assigned to it and when appropriate revise them. We have determined that another revision to ANSI C63.19 is appropriate and accordingly have opened a project to that end. The project authorization lists the following reasons for this revision:

A number of developments, relevant to ANSI C63.19, created a need to review the impact and consider the advisability of revising and updating the standard. Among these developments are issues with:

1. Growing importance of VoIP and VoLTE for telephony services.
2. Hearing aid user satisfaction with HAC.
3. Adequacy of volume control.
4. Adequacy of T-Coil reception.
5. Harmonization with corresponding IEC 60118-13 and IEC 60601-2-66 standards.
6. Cover new technologies, particularly at TVWS devices and cellular at 600 MHz, 3.5 GHz and 5.0 GHz, which may include extending the lower boundary of the frequency range covered.
7. Use of software defined radio (SDR) and other new instrumentation in HAC measurements.
8. Simultaneous transmissions, particularly in smartphones.³

² Amendment of the Commission's Rules Governing Hearing Aid-Compatible Mobile Handsets, WT Docket No. 07-250, *Third Report and Order*, 27 FCC Rcd 3732, 3735, ¶ 9 (2012).

³ ANSI Project Initiation Notification System Form for ANSI C63.19, dated November 9, 2015. Approved by ANSI ASC C63[®] on November 12, 2015.

We recognize that not all topics listed in our project authorization are relevant to this NPRM but we include them for completeness. It is our objective to keep this standard current, responsive to the needs of the FCC and effective in its role in providing hearing aid compatibility.

Beyond the development of standards, supports industry through training and issuing of interpretations of ANSI ASC C63[®] standards. We have issued interpretations of the ANSI C63.19 Standard when such assistance is requested. For example, in May and June of 2012, several questions regarding this standard were brought to the committee. In response, the committee published four interpretations in the June-July 2012 timeframe.⁴ We will continue to respond to requests for interpretation, as they are received.

Set forth below are ANSI ASC C63[®] subcommittee 8's responses to specific questions the Commission has raised in this docket:

I. Joint Consensus Proposals

As we are a consensus body, committed philosophically but also by our by-laws to inclusion of all materially affected stakeholders in our standards development, we believe consensus solutions are the preferred approach in complex issues such as hearing aid compatibility.

We would observe that during the course of revising ANSI C63.19 it will be necessary to gather information that will have significant overlap with the task force suggested in the Joint Consensus Proposal. It will be necessary to not only gather information but explore what the consensus is as we seek to apply new information to the revision of ANSI C63.19. If these efforts might also serve to advance the purposes motivating the proposal for a task force, we offer to assist in any way that would be constructive.

⁴ Interpretations of C63 standards are found at:
http://www.c63.org/documents/misc/posting/new_interpretations.htm.

II. Coordination with TIA is ongoing.

In developing the 2011 version of the ANSI C63.19 standard we were careful to coordinate our efforts with those of TIA, regarding hearing aid compatibility. We would observe that TIA is an active member of ANSI ASC C63[®]. In our view, the TIA and ANSI HAC standards should be harmonized to the maximum extent possible, with the differences being only those necessary to address the unique issues of each area of technology.

III. Do the categories in ANSI C63.19 continue to serve a purpose?

During the revision of any standard it is important to revisit the reasons decisions were made as they were and underlying assumptions. A revised standard should only take into the future what continues to serve a useful purpose. To that end we wonder if the categories used in ANSI C63.19 continue to serve a useful purpose? We note that the FCC's use of the standard, declaring a category 3 or higher to be HAC essentially uses the standard as a pass/fail, rather than a category based standard.

Originally the categories were intended to represent different service levels. A hearing aid user who selected an M4/T4 handset over an M3/T3 was expected to get a noticeably better listening experience. During our revision we will be revisiting this objective and seeking information on whether the objective is the experience of hearing aid users.

IV. Summary

We thank the Commission for this opportunity to provide them an update on the issues discussed herein. We intend to communicate to the Commission the status of our revision effort and related efforts, as they develop.

Respectfully submitted,

ANSI ASC C63[®] Subcommittee 8

/s/ Mr. H. Stephen Berger
Chairman, ANSI ASC C63[®] Subcommittee 8

January 28, 2016