

I strongly disapprove of the proposed auction of the 216 to 217 MHz band.

BARRIERS TO ACCESS

Electronic interference is a barrier to access for persons who use assisted listening devices -- just as curbs are a barrier for persons who use wheelchairs.

Increased electronic interference resulting from reassignment of this frequency band will create new barriers to access.

The 216 to 217 MHz band is used to provide access to public education and events for people who have hearing impairments. Of the many situations in which this frequency band is used for public access, perhaps the situation of greatest need is that of school children who have a hearing loss. It is simply outrageous to think that their fundamental needs might be considered less important than the wishes of a commercial enterprise to offer yet *another* paging system.

In addition, this band is also being used by at least two top-of-the-line FM assisted listening devices (ALDs) sold for personal use by people with hearing impairments: the new AVR LogiCom TX20 and the Phonak MicroLink systems. Other manufacturers are also moving to this band because it is relatively free of the electronic interference that plagues users of other frequency bands.

I am profoundly hard of hearing. Although my hearing aids have helped me regain much of my ability to understand speech, I have found that in many situations hearing aids alone are not sufficient to meet my needs. Thus, I am currently using the Phonak MicroLink HandyMic and AVR TX20 receiver boots.

My HandyMic FM system extends the range of my hearing aids, thus allowing me to fully participate in group situations such as work, classes, lectures, meetings, social events, and family gatherings. Without clear reception on the HandyMic, I would, once again, be relegated to sitting on the sidelines, unable to participate in many of the events that make life enjoyable and productive.

ECONOMIC CONSIDERATIONS

Assisted listening devices are very expensive and rarely covered by health insurance. Both individuals and public entities who use these systems have made a significant out-of-pocket investment. The value of that investment would be seriously compromised if this frequency band were to be sold for commercial or other use. Interference from competing sources would severely limit their usefulness.

The purchase of my personal FM system required a considerable financial sacrifice on my part. I had reasonably anticipated that I would be able to spread the cost of this equipment over a useful life of several years. If this band is reassigned, I expect that the useful life of my equipment will be considerably shortened.

FUTURE NEEDS

It was less than five years ago that the FCC expanded the frequency bands for ALDs to include the 216 to 217 MHz band. This was done because the lower frequency bands then assigned to ALD users were

becoming increasingly congested. The resulting increase in electronic interference severely limited the use of these ALDs. The 216-217 MHz band, however, is relatively free of the interference that clutters other frequencies.

Hearing loss is one of the most common forms of disability. As of 1990, it was estimated that at least 28 million people in the US had some degree of hearing loss. Further, there is reason to believe that the incidence of hearing loss is increasing at a faster rate than the population as a whole. As the incidence of age-related and noise induced hearing loss increases, more and more people will need to begin relying on some form of hearing assistive device, including ALDs, in order to continue functioning in their economic, social, and family lives.

The 216 to 217 MHz band will be sorely needed if we are to meet the demands of the future.

I strongly urge you not to issue new licenses to anything else on the 216 -217 MHz band and to elevate auditory assistive devices to primary status on this band. Further, it is crucial to understand that many ALDs are used by individuals as personal, mobile units.

Thank you.