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Storrs, CT 06268  
February 25, 2001

Commission's Secretary  
Magalie Roman Salas  
Office of the Secretary  
Federal Communication Commission  
445 12<sup>th</sup> St., S.W. TW-A325  
Washington, D.C. 20554

FCC MAIL ROOM

Subject: Reallocation of the 216-217 MHz Band  
ET Docket No. 00-221, RM-9627, RM-  
9692, RM-9797, RM-9854

To Whom It May Concern:

I am writing as a hard of hearing person who has worn hearing aids for fifty years as well as a Audiologist nearly that long.

As an Audiologist, I have been intimately involved with FM auditory training systems from the time they were first introduced (using the 72 to 76 MHz band). This involvement has included publishing the first clinical research articles on their classroom efficacy thirty years ago, writing about them in a number of book chapters and editing a book on FM Auditory Training systems about 10 years ago.

As a hard of hearing person, I have personally used FM systems for communication access in situations in which this would not have been possible without this device. Such situations have included staff meetings (using an FM conference microphone), noisy receptions and restaurants, seminars and lectures, and movies and theaters. In addition, when I lecture I pass an FM microphone around so that I can hear students' questions. Without an FM assistive listening device, I could not continue to engage in many cultural, social and professional activities. My life would be seriously constrained.

I am now, and have for the past few years, been using an FM system that employs the 216-217 MHz band. Besides the fact that I experience much less interference with this band than the 72-76 MHz band, the higher broadcast frequency permits a smaller and more effective antenna in the FM/HA receiver. Reverting to the lower frequency bands would not only require different hearing aids, but because of interference could not be as effective as the higher 216 MHz band.

I'm afraid that the present FCC plan to auction this portion of the radio spectrum would be disastrous, not just to me and other hard of hearing adults, but to the many children in schools who are now using auditory assistive devices that employ this frequency. Right now, I understand the band is defined as secondary LPRS, subject to interference from primary users on the same band. I ask that the FCC define this band, when used for

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auditory assistive devices for persons with hearing loss, be given primary status. This would protect the integrity of this portion of the radio spectrum for use by people who desperately need this protection if they are to be given the best opportunity to fully participate in our society,

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mark Ross', is positioned above the typed name.

Mark Ross, Ph.D.  
Audiology Professor Emeritus  
University of Connecticut