



DOCKET FILE COPY ORIGINAL

# American Society For Deaf Children

Serving families of Deaf and Hard of Hearing Children since 1967

March 7, 2001

RECEIVED

Magalie R. Salas  
Federal Communications Commission  
445 12th Street SW, TW-A325  
Washington, DC 20554

MAR 8 2001  
FCC MAIL ROOM

Re: Docket 00-221, In the Matter of Reallocation of 216-220 MHz

Dear Secretary Salas :

On behalf of deaf and hard of hearing children who use assistive technology for communication in schools, theaters, and in other community settings, the American Society for Deaf Children (ASDC) urges the Federal Communications Commission (FCC) to protect the 216-217 MHz band so the access to communication for these children can be preserved.

The FCC itself recognizes the importance of doing so. In the Notice of Proposed Rulemaking (NPRM) it points out:

"We are also concerned about the continued viability of the incumbent, non-Government services, particularly LPRS, in the 216-220 MHz band, which, while not authorized on a primary basis, serve important public needs. We established the LPRS in 1996 to advance the use of affordable communications devices by the hearing impaired, thus furthering the goals of the Americans with Disabilities Act of 1990 and the Technology-Related Assistance for Individuals with Disabilities Act Amendments of 1994. The auditory assistance devices, as well as currency tracking devices authorized under LPRS, provide valuable services to the public. There are over 23 million Americans that are hearing impaired. The assisted listening devices, which operate in this band, are being increasingly relied upon by persons with special auditory needs, particularly in schools by children. LPRS users are licensed by rule, and thus we maintain no records on the number or location of users, which would complicate coordination with new service providers. Ocean buoy and wildlife tracking, as well as being valuable services, complicate the use of the 216-220 MHz band because of their itinerant nature. Finally, we note that telemetry is heavily used in both urban and rural areas."

No. of Copies rec'd \_\_\_\_\_  
List ABCDE \_\_\_\_\_

0+1

Thus, there is no dispute that preservation of these bands for assistive listening purposes is critical. ASDC regularly hears from the parents of children who use this technology. Here are some of their stories.

===

“Our daughter, Maggie, is a very active three year old. She was identified at birth with a moderate to severe hearing loss, and has worn her hearing aids since she was 4 months old. She has had an FM system since she was about 10 months old. The FM system has helped a great deal when we are in areas with a lot of noise, such as the car, grocery store, mall, fairs etc.. Maggie is able to isolate my voice above all of the rest of the noise that she is hearing. This is very important, especially in areas where she could get hurt or lost easily. The FM system has also helped in aiding her speech development. The FM system gives us the ability to eliminate all background noise so that she can concentrate on what she is being taught.

“Thank you for giving us the opportunity to give our opinions. Please don't eliminate the specially designated frequency that the FM system operates on; our daughter has so few opportunities to excel without working twice as hard as other children, and eliminating the FM frequency would take away an opportunity for her to have a little bit of assistance.”

Mrs. Elizabeth Nee

===

“My daughter is 6 and attends first grade fully mainstreamed. She relies on an interpreter as well as her FM system to fully understand her teacher's instructions. If her FM system were to pick up interference with other devices, it would greatly inhibit her ability to learn. I am quite troubled with the news that the FCC would even consider auctioning off the frequencies used for these devices. Please do whatever you can to prevent this from happening. We need to preserve these frequencies !!!

“With thanks for your efforts.”

Kathryn Jaskiewicz

===

“I am the parent of a 4 1/2 year old boy, who has a severe hearing loss in addition to an attentional disorder. My son, Jon, currently uses an FM system at home as well as at school in order to decrease background noise and improve

the clarity of the primary speaker. This system is extremely important at school, as his ability to discriminate speech is paramount to his success academically.

“We also use an FM unit at home, which we purchased privately. We have found that this helps decrease the effects of environmental sounds, which can make it nearly impossible for a deaf child to listen. Some examples are the t.v., washing machine, dryer, dishwasher, other conversations, toys, pots and pans, etc... The FM unit has also really been helpful outside. If Jon is darting out in the street, or riding his bike too far, I can get his attention, which I couldn't do otherwise. This becomes an important safety issue.

“I am concerned about the possibility of losing rights to this frequency band. It is of utmost importance that our children continue to be protected with sole rights to use this frequency.”

Pam Lilley

===

“I am the mother of two boys who have progressive hearing loss. Both of my children use the FM, and it is essential in their education. My 9 yr old son (hard of hearing with a moderate to severe hearing loss) uses a Phonak Microlink FM while he is in school (it belongs to the school.) My 14 yr old son (deaf, with severe to profound hearing loss) has a Free Ear, which we purchased three years ago. I think taking away the FM band would be against the ADA, and IDEA, as our children would lose their access to full participation in their education.”

Marcie Wolf-Hubbard

===

“Please DO NOT sell FM bands 216-217 MHz. The proposed sale of FM bands 216-217MHz and any others currently reserved for assistive listening devices for deaf and hard of hearing citizens would cause much hardship for students, schools, and businesses who are utilizing these frequencies to access classrooms, boardrooms, telephone conversations, and myriad other details of normal life. My daughter is 14 and profoundly deaf. She utilizes hearing aids and uses an FM transmitter to access the classroom as well as phone conversations and other activities. There are already occasional interruptions of her FM signal (from the occasional beeper or other radio transmission that falls in the frequency assigned) and these interfere with her education each time they occur.

“If these FM bands are sold to the highest bidder they will not be available to her to conduct her business- making it more difficult for her to become a productive citizen. Our goal for our daughter is that she graduate from college and become

a productive citizen. Because she is deaf there are obstacles that aren't faced by hard working hearing people. With the help of regulations that equalize access to life, such as availability of FM frequencies for communication access, TV captioning, and options for print access to spoken internet communications my daughter will be able to achieve her goals through her own hard work, rather than being left in the dust because advances in technology are not accessible to those who do not hear."

Benna Timperlake

===

"My five year old son, Adam, uses an FM system everyday at school. As he is 80% hearing impaired he would have a very hard time without the system. When he started head start last year, the IU found out that he was having a hard time understanding the teachers. Therefore, his hearing impaired support teacher recommended an FM system.

"I am very concerned about the reallocation issue. We just moved Adam to a new school with a hearing impaired class for kindergarten students. All the students in the class have their own systems. If the frequencies start to get a lot of interference, it will be very hard on all the students and the teacher."

Amy Myers

===

"While I do not have a deaf child, my niece is deaf and uses the FM transmitter to aid her communication. In addition, as a naturalist I visit 9 schools in my Chautauqua County, NY. I see 3 or 4 students in the course of a year who depend on these transmitters to hear what I am saying. These are only students in my area integrated into the mainstream, there is also a special class for those who are more profoundly deaf. It would be very disturbing to see these children's lives interrupted if the FCC auctioned off the bandwidths."

Jeff Tome

===

"I am the mother of a 10 year old boy who has been mainstreamed in public school since kindergarten and has used an FM trainer throughout these years. My son has suffered from a progressive hearing loss and over time has lost most of his hearing. He is a thriving, bright, young man who has been able to be a part of public education because of his FM trainer and the great teachers who

have agreed to wear the other component of this unit. Putting this band up for auction is telling my child we as a country don't care about those who already face enough challenges with the cards they have been dealt. Please think of our kids, think of your own kids, or how you would feel in their shoes. Life is hard enough for my son, without worrying whether his government is trying to save money by taking away something that benefits so many kids. I urge you to find other areas to cut from not ANY that effect our kids, their schools, and their education! Thank you."

Marjorie Gordon

===

"My daughter Laura wears hearing aids in both ears to hear as we hear every day. She wears the FM unit in school everyday to hear her teachers teach. If they do auction this off how is my daughter supposed to get the education that every child deserves? I think the FCC should rethink this horrible idea."

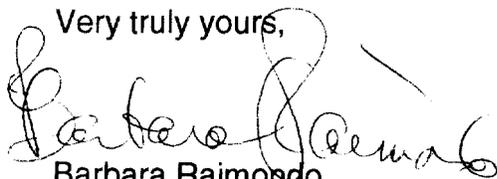
(Unidentified parent)

===

The American Society for Deaf Children (ASDC) is a national organization of families and professionals committed to educating, empowering and supporting parents and families to create opportunities for their children who are deaf and hard of hearing in gaining meaningful and full communication access, particularly through the competent use of Sign Language, in their home, school, and community. ASDC's primary mission is to assure the highest quality programs and services for parents in making sound and informed choices to meet their children's educational, communication, personal and social needs so that they may fully participate in the global community in the 21st century.

In closing, ASDC urges you to maintain the 216-217 MHz band for our children's assistive listening purposes. Thank you for this opportunity to comment and for consideration of our views.

Very truly yours,



Barbara Raimondo  
Director, Public Affairs  
American Society for Deaf Children