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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

August 1, 2001

The Honorable Michael Powell
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear Chairman Powell:

Re: WT Docket No. 01-108

AARP appreciates having the opportunity to comment on the Federal Communications Commission's (FCC) proposed elimination of the analog compatibility standard. This proposal, if adopted, would have a direct impact on the ability of mid-life and older Americans to continue to use their analog phones. A significant percentage of the estimated 41.9 million users of analog service are consumers aged 50 and older who subscribe to wireless telephone service. Additionally, an AARP study reveals that 54% of consumers over the age of 65 use wireless phones, the vast majority for reasons of security. AARP is concerned that the elimination of the analog compatibility standard will leave many of these consumers without the ability to use a service they have come to rely on. We ask the FCC, in its move toward digital wireless telephony, to preserve the analog standard for the foreseeable future.

AARP has been an advocate of technological advances as a means to provide more and better choices for consumers of telecommunications services. We view the wireless industry's move from an analog signal to one that is digital as a benefit to consumers. Digital technology allows carriers to provide improved service quality, better features, enhanced reliability and more privacy. AARP is concerned, however, that if the Commission allows carriers that currently provide analog services to abandon them, a critical segment of the population will be adversely affected.

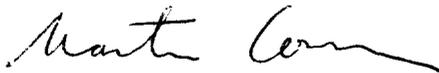
Elimination of analog service will disrupt the lives of a number of the users of this service. Some subscribers may not have the means to upgrade to digital services, while others may not be aware of the change. In either case, the elimination of the service will leave many consumers abandoned, perhaps even jeopardizing their safety. Additionally, programs run by charitable organizations that offer analog cellular phones to seniors or others for emergency purposes may be terminated.

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We urge the FCC to ensure that the analog standard is maintained for the foreseeable future, while consumers migrate from analog to digital service. Carriers can do their part to accelerate the process by offering to replace existing analog service with digital service, at no charge to the consumer. Such an action will decrease the base of analog subscribers, while ensuring that at-risk consumers have access to reliable wireless service in the event of an emergency.

AARP looks forward to working with the Commission and the carriers on this matter in the hope that we can promote technological advances in wireless services without degrading or eliminating analog service for those who rely on it.

Sincerely,

A handwritten signature in black ink, appearing to read "Martin Corry". The signature is fluid and cursive, with a long horizontal stroke at the end.

Martin A. Corry
Director
Federal Affairs