



January 31, 2003

VIA ELECTRONIC DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Room TW-A325
Washington, D.C. 20554

Re: Ex Parte Notice; WT Docket No. 01-309

Dear Ms. Dortch:

On January 30, 2003, Mary Brooner, Tim Harr, Scott Isabelle and Scott Kelley of Motorola, Inc., and David Hilliard of Wiley Rein & Fielding LLP met with Joel Taubenblatt, Deputy Chief of the Policy Division, Wireless Telecommunications Bureau, Joe Levin, Mindy Littell and Patrick Forster of the Policy Division, Wireless Telecommunications Bureau, and Jerome Stanshine, Office of Engineering and Technology, to discuss the results of research conducted by Motorola on digital wireless phones and hearing aids.

The goals for Motorola's research were to understand better the real-world experience of digital wireless phones for users with hearing aids and to understand better the ability of ANSI C63.19 to predict such results. A copy of the presentation is attached.

The research that was discussed was conducted with volunteer participants who attended the Self-Help for Hard of Hearing (SHHH) convention in June of 2002. Each participant wore an aid device and listened to speech over 9 different digital handsets. The digital handsets were connected to live networks. There were 3 digital handsets tested for each air interface – GSM, TDMA and CDMA. All tested handsets were designed with dynamic loudspeakers, were turned on to maximum volume and had the backlights turned off. The research participants rated 4 aspects of the experience: understandability, interference noise, listening effort and overall quality.

The conclusions drawn from the research were that two types of emissions impact hearing aid usability: intentional cellular RF transmissions (electric and magnetic fields) and other emissions and fields (electric and magnetic fields). Some hearing aids performed very well across all air interface technologies, but others suffer significant

interference even with digital wireless phones that score well under C63.19. Lastly, Motorola recommends that for purposes of handset performance in the digital mode, only the digital mode should be measured for C63.19 for those handsets which operate in both digital and analog mode.

Respectfully submitted,

/s/ Mary E. Brooner

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cc: Joel Taubenblatt, Deputy Chief, Policy Division, Wireless
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