

March 21, 2003

VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Samsung Telecommunications America, L.P.
WT Docket No. 01-309; RM-8658
In the Matter of Section 68.4(a) of the Commission's Rules Governing Hearing Aid
Compatible Telephones
Notice of *Ex Parte* Presentation

Dear Ms. Dortch:

Pursuant to Section 1.2106 of the Commission's rules, Samsung Telecommunications America, L.P. ("STA"), by its attorneys, hereby notifies the Commission of an oral *ex parte* presentation yesterday with staff from the Wireless Telecommunications Bureau ("WTB"), the Consumer and Governmental Affairs Bureau ("CGB"), and the Office of Engineering and Technology ("OET"). WTB staff in attendance were: Joel Taubenblatt, Legal Advisor to the Bureau Chief; Mindy Littell, Attorney Advisor; Greg Guice, Attorney Advisor, Policy Division; Joseph Levin, Economist, Policy Division; and Patrick Forster, Engineer, Policy Division. CGB staff in attendance were: Genero Fullano, Legal Advisor, Office of the Bureau Chief; Janet Sievert, Legal Advisor, Disabilities Rights Office; and Tom Chandler, Disabilities Rights Office. OET staff in attendance were: Julius Knapp, Deputy Chief; Rashmi Doshi, Chief, Laboratory Division; and Jerry Stanshine, Telecommunications Systems Specialist. In attendance for STA were Pamela Day, General Counsel, and Muzibul Khan, Vice President, Product Management and Engineering. Also in attendance was Robert G. Morse of Wilkinson Barker Knauer, LLP, counsel for STA.

The attendees primarily discussed the facts and issues raised in STA's written *ex parte* presentation of March 3, 2003 (copy attached). In particular, STA discussed the features of its CDMA handsets which may help facilitate usability by hearing aid users, such as form factors, earpiece specifications (designed to the Part 68 standard), backlight modes, and circuitry and

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Marlene H. Dortch

WT Docket No. 01-309; RM-8658

March 21, 2003

Page 2

shielding features designed for compliance with SAR requirements which may also have incidental benefits. STA emphasized that to date it has not formally tested its products for compliance with specific hearing aid devices, and that it has not designed or tested in accordance with ANSI standard C63.19 levels U3/U4, which would require disruptive changes to the handset design and take considerable time to incorporate into commercially-available product. STA reiterated concerns that manufacturers' designing handsets to this standard, in itself, does not necessarily portend to usable products for hearing aid users. STA also stated that should the standard be imposed, compliance with the standard should constitute a safe harbor for HAC and Section 255 purposes. Finally, STA suggested that a technical advisory committee or similar body be convened to better ascertain sources of and means of mitigating interference to hearing aid devices.

Please contact the undersigned if there are questions concerning this filing.

Sincerely,

Robert G. Morse/s/_____

Robert G. Morse

Attachment