

CTIA

Building The Wireless Future™
Cellular Telecommunications & Internet Association

June 13, 2003

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby, TW-A325
Washington, D.C. 20554

**Re: *Ex Parte* Presentation
WT Docket No. 01-309**

Dear Ms. Dortch:

The Cellular Telecommunications & Internet Association (“CTIA”) is committed to ensuring that consumers with hearing disabilities are able to use state-of-the-art mobile wireless phones and service. CTIA members wish to promote use of their mobile service offerings by all consumers, including individuals with hearing disabilities. As a result, CTIA has focused significant resources on developing a proposal in this proceeding that will enable consumers with hearing aids to achieve usability of their mobile phones. To further that goal, in this letter the mobile wireless industry proposes several specific action steps that we believe will, as part of a cooperative effort among all affected parties, succeed in enabling consumers with hearing disabilities to enjoy the full range of state-of-the-art mobile services and products on the market.

There are three primary areas that the CTIA proposal addresses: the need for improved consumer education, the difficulty of hearing aids experiencing interference from digital mobile phones, and the availability of inductive coupling capability for those consumers using T-coils.

I. Consumer Education

As an immediate deliverable, wireless handset manufacturers will commit to provide to consumers, through a website established by CTIA, information on wireless phones currently available that may provide:

- Inductive coupling capability; or
- Lower levels of RF interference so that the phone might be more likely to be usable by a consumer with a hearing aid; and
- Available accessory devices that can serve to provide inductive coupling capability or reduce interference received by the hearing aid.

Until objective measurements applicable to wireless phones regarding interference mitigation or inductive coupling capability are developed as described



below, determinations as to which phones meet these criteria and will be included on the website will be left to individual manufacturers.

The CTIA-sponsored website will also include a message board where consumers can post their positive experiences about wireless phones they have found work with their particular hearing aids.

CTIA and its member companies would also commit to work with carrier sales forces, consumer and professional organizations in a comprehensive educational outreach effort. The wireless industry understands that consumers want more detailed information about the options available to them if they wear a hearing aid and want to use a wireless phone. In addition, providing more and better information about wireless phones to professionals who dispense hearing aids will assist them in helping their patients to make the best choice of a wireless phone that will likely work with their hearing aid.

II. Interference

Wireless handset manufacturers would commit to a focused and time-limited effort to validate the American National Standards Institute (“ANSI”) C63.19 hearing aid compatibility standard. This effort would be coordinated by the Alliance for Telecommunications Industry Solutions (ATIS) and would be operated through ATIS’s Incubator Solutions Program. The wireless industry can be ready to activate this commitment immediately and would invite technical participation by the hearing aid manufacturers, consumer groups, and ANSI. The FCC would also be invited as an observer to the process.

Full and good faith participation by the hearing aid industry in this process is preferred because the ANSI C63.19 standard is systems-based (i.e. wireless phone and hearing aid in combination). However the wireless industry will seek participation by alternative contributors knowledgeable of the hearing aid industry, such as consultants, if the hearing aid industry chooses not to participate.

CTIA requests that the FCC not require use of the analog component of the C63.19 standard. Use of the analog component of the ANSI C63.19 appears to distort the results of the tests for digital phones with analog capabilities and is not necessary for the determination of a rating of a handset operating in digital mode.

CTIA anticipates that, following this study period, all affected parties will be prepared to determine how the validated standard will best enable consumers to have an effective evaluation tool to determine if their hearing aid will work with a particular handset.

III. Inductive Coupling

To provide for uniform performance expectations for inductive coupling of a hearing aid with a wireless phone, a wireless phone inductive coupling standard needs to be developed. This standard can be developed as a discrete part of the Incubator



Solutions Program and will likely draw on a refinement of either the wireline Part 68.316 standard or the ANSI C63.19 “UT” measurement. This process would parallel the validation of the C63.19 standard.

Once an inductive coupling standard has been developed, wireless handset manufacturers will be better prepared to offer inductive coupling capability. Due to development, design and manufacturing timing issues, some manufacturers will require adequate lead-in time before new products that meet the standard can be brought to market, although there are *already* many handsets available that are likely to provide the requisite capability.

In considering the inductive coupling capability issue, CTIA submits that there are several reasons why it would not be in the public interest for the FCC to require internal inductive coupling capability for every – or even most – wireless phones. First, hearing aids in inductive coupling mode are susceptible to additional sources of interference that could possibly eliminate the benefits of inductive use with a wireless phone. Second, depending on the design of the handset, deploying internal inductive coupling capability in wireless handsets involves design tradeoffs that could detract from design features and performance capabilities that would be desirable to consumers. CTIA accordingly recommends that wireless handset manufacturers be allowed, following development of the standard, to determine which products would likely provide the best platform for inclusion of inductive coupling capability. CTIA is confident that this process will result in consumers having a significant choice of internal inductive coupling options.

CTIA also submits that innovation and selection of inductive coupling capable phones can be further enhanced with functionally equivalent attachable components to enable inductive coupling capability. This option contemplates complementary-designed external components (in addition to currently available accessory options such as loopsets and silhouettes) that can be directly attached to phones to provide inductive coupling capability. CTIA asks the FCC not to foreclose this alternative option for providing inductive coupling capability.

Finally, CTIA urges the Commission as it weighs action in this proceeding to bear in mind that countries throughout the world face the same challenge, and have found effective solutions to achieve hearing aid/digital phone usability *without requiring modifications to mobile phones*. Mobile phone manufacturers must utilize global manufacturing platforms to remain competitive in today’s marketplace, and placing onerous requirements on their manufacturing processes when other options offer a better solution would be counterproductive in the long run for consumers – whether or not they have a hearing disability.

CTIA and its member companies believe that the goal of usability of mobile phones for individuals with hearing disabilities can be achieved if all the affected parties work together to focus on solving on this technical challenge. CTIA and its member companies are prepared to devote significant resources to participate fully in this process



and look forward to a continuing dialogue with the Commission and all parties participating in this proceeding.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being electronically filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

Diane Cornell

Diane Cornell

cc: Chairman Michael K. Powell
Commissioner Kathleen Q. Abernathy
Commissioner Michael J. Copps
Commissioner Kevin J. Martin
Commissioner Jonathan S. Adelstein
Bryan Tramont
Jennifer Manner
Paul Margie
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