HEARING AID COMPATIBILITY

Cellular Telecommunications &
Internet Association

Presentation to
The Wireless Telecommunications Bureau
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CTIA

Consumer Education

- Immediate deliverable - wireless handset manufacturers 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
- Website will include a message board for consumers to post their experiences about wireless phones they have found work with their particular hearing aids
- CTIA and member company commitment for a comprehensive educational outreach effort to industry, consumers, and professional organizations

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Interference

- Commitment to a focused and time-limited effort to validate the American National Standards Institute ("ANSI") C63.19 hearing aid compatibility standard
- Coordinated by the Alliance for Telecommunications Industry Solutions (ATIS) and operated through ATIS's Incubator Solutions Program
- Use of the analog component of the C63.19 standard should not be required
  - Analog does not interfere with hearing aids, and
  - Use of the analog component of the ANSI C63.19 distorts the results of the tests for dual mode phones

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Interference

- Wireless industry can be ready to activate this commitment immediately and would invite technical participation by the hearing aid manufacturers, consumer groups, and ANSI; FCC invited as an observer to the process
- Participation by the hearing aid industry in this process is necessary because the ANSI C63.19 standard is systems-based (i.e. wireless phone and hearing aid in combination)
- Following validation, determination can be made as to 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

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Inductive Coupling

- Wireless phone inductive coupling standard needs to be developed
- 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
- Following development of standard, wireless handset manufacturers will be better prepared to offer inductive coupling capability
- Adequate lead-in time required before new products that meet the standard can be brought to market
- There are *already* many handsets available that are likely to provide the requisite capability

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Inductive Coupling (continued)

- T coil users, at most, are 0.8% of wireless subscribers
- FCC should not require internal inductive coupling capability for every – or even a substantial percentage of – wireless phones
- 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
- 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
- Wireless handset manufacturers should have flexibility to determine which products would likely provide the best platform for inclusion of inductive coupling capability
- Result will be a meaningful choice of handsets with inductive coupling capability

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Inductive Coupling (continued)- Functionally Equivalent Attachable Components

- FCC should not foreclose the option of providing functionally equivalent attachable components to enable inductive coupling capability
- 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 should be allowed
- Such components can provide effective alternatives to internal coupling

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International Solutions

- Countries around the world faced the same challenge and found effective solutions to achieve hearing aid/digital phone usability *without requiring modifications to mobile phones*
- Mobile phone manufacturers utilize global manufacturing platforms to remain competitive in today's marketplace
- Imposition of onerous design requirements on 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

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Conclusion

- 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 this technical challenge
- CTIA and its member companies are prepared to devote significant resources to participate fully in this process

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