

Hearing Aid Compatible Telephones
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RM-8658

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(1) Digital wireless phones tested: WestLink Communications, LLC (“WestLink”) operates a 1900 MHz GSM system and acquires wireless telephone handsets manufactured by Nokia, Motorola and Sony Ericsson (collectively, “Vendors”). To WestLink’s knowledge, these Vendors are not presently offering any GSM handset devices that are compliant with the ANSI C63.19 U3 standard (“Compliant Phones”). Accordingly, no phone devices have been tested to date.

(2) Laboratory used: WestLink does not conduct the laboratory testing of handset devices for compliance with the ANSI C63.19 standard. Because WestLink’s Vendors have not begun to offer compliant devices, WestLink has not yet devised a means for testing. Instead WestLink will likely rely on its Vendors to conduct testing and to confirm the compliance of each specific handset device.

(3) Test results for each phone tested: As indicated, no tests have been conducted to date.

(4) Identification of compliant phone models and ratings according to ANSI C63.19: As indicated herein, WestLink has not yet identified any available GSM handset devices that are compliant with the ANSI C63.19 U3 standard.

(5) Status of product labeling: WestLink typically relies upon its Vendors to label all products prior to their shipment to our retail locations. To WestLink’s knowledge, no Vendor has made arrangements for product labeling that makes reference to HAC. However, WestLink itself labels a set of four handset models that it presently offers as

"hearing aid compatible" by either volume control or special earbud adapters, listing the special compatibility characteristics of each.

(6) Outreach efforts: When compliant phones become available they will be publicly identified for consumers and audiologists. Compliant phones will be listed on WestLink's web sites, and the information will be communicated to consumer groups. WestLink will train its retail salespeople regarding which digital wireless phones are compliant. It is contemplated that written materials, pamphlets and other promotional literature will be provided at the point of sale, addressing the needs of individuals with hearing disabilities. WestLink will consider developing consumer education programs aimed at reaching hearing aid and cochlear implant users. Consumers will be given a 30-day trial period within which to try out digital wireless phones to determine whether they will work properly with their hearing aids; flexible return policies will apply to consumers seeking to obtain compliant phones. Toward this end, WestLink may conduct outreach activities toward audiologists and hearing aid dispensers who are in a position to inform hearing aid users in advance concerning the immunity of their hearing aids and the degree of likelihood that they will be able to use particular digital wireless phones and services.

(7) Retail availability of compliant phones: As indicated previously, no Compliant Phones are presently available in WestLink's retail outlets.

(8) Incorporation of hearing aid compatibility features into newer models of digital wireless phones: WestLink is unaware of any plans that its Vendors may have to incorporate HAC features into future GSM phones.

9) Activities related to ANSI C63.19 or other standards work intended to promote compliance with the FCC Order: WestLink is unaware of any activities that its Vendors may be undertaking to comply with the FCC Order. WestLink is ready and willing to offer compliant devices to interested customers, and will encourage its Vendors to expedite the availability of such handset devices.

(10) Number of compliant and non-compliant phone models offered at this time: WestLink's core assortment presently includes 16 models of GSM handsets. To WestLink's knowledge, none of these are Compliant Phones.

(11) Differences in handset offerings among regions in service areas, if any: WestLink's handset offerings are uniform throughout its service area.

(12) Ongoing efforts for interoperability testing with hearing aid devices: WestLink has not conducted interoperability testing due to the non-availability of Compliant Phones.