

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
) CC Docket No. 04-70
Transfer of Licenses from AT&T)
Wireless to Cingular Wireless)

Comments of Self Help for Hard of Hearing People (SHHH)

Self Help for Hard of Hearing People (SHHH)¹ sends these comments to support the Cingular Wireless request for approval to merge with AT&T Wireless. Our support and interest is purely from the perspective that it would be in the best interest of people with hearing loss.

Both companies bring different strengths to the disability access field that complement one another and should translate into even stronger developments if they are allowed to merge. The combined company services could be even better and reach a much higher percentage of the millions of individuals who have or will have hearing loss.

Cingular Wireless has supported a range of efforts to address the technological barriers to people who have hearing loss. Almost all their handsets are TTY compatible and 711 access to relay services is available. From what SHHH understands, Cingular tests their networks for TTY compatibility before roll out and have actually delayed roll out to be certain they can provide TTY compatibility. This is a road map that the new company can follow.

Though there are less concrete results yet in the area of hearing aid compatibility, Cingular has historically taken the lead in providing detailed recommendations for technological solutions and garnered support from ATIS to develop a technical incubator that is currently underway and meeting regularly. AT&T Wireless has put resources into

¹ Self Help for Hard of Hearing People, SHHH, is the nation's foremost consumer organization representing people with hearing loss. SHHH's national support network includes an office in the Washington D.C. area, 13 state organizations, and 250 local chapters. The SHHH mission is to open the world of communication to people with hearing loss through information, education, advocacy, and support. SHHH provides cutting edge information to consumers, professionals and family members through their website, www.hearingloss.org, their award -winning publication, *Hearing Loss*, and hearing accessible national and regional conventions. SHHH impacts accessibility, public policy, research, public awareness, and service delivery related to hearing loss on a national and global level.

staff training on accessibility and maintains an inventory of accessible equipment in some of its retail stores that customers with hearing loss can view and try out.

If the merger were approved, Cingular would become the largest carrier in the United States. The merger could potentially enable Cingular to have more influence on the development of accessible handsets as they will have much greater buying power.

SHHH believes the Cingular AT&T Wireless merger would be a positive move for the future of accessibility of telecommunications products and services for people with hearing loss, and on that basis we support the merger.

Respectfully submitted,

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