

**Entertainment Unlimited, Inc.
733 Marsh Street
Suite B
San Luis Obispo, California 93401**

**Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 – 12th Street, S.W.
Washington, D.C. 20554**

**Re: WT Docket No. 01-309
HAC Digital Wireless Telephones**

First Semi-Annual Report

Dear Ms. Dortch:

The Filer, Entertainment Unlimited, Inc., is the licensee of Broadband Personal Communications Service (“PCS”) Stations KNL915 (Channel Block D, Salinas – Monterey, California BTA), KNLG742 (Channel Block D, San Luis Obispo, California BTA), KNLG743 (Channel Block F, San Luis Obispo, California BTA), KNLG744 (Channel Block D, Santa Barbara – Santa Maria, California BTA), WPOK945 (Channel Block C, Bakersville, California BTA) and WPOK946 (Channel Block C, Visalia – Porterville – Hanford, California). This report is submitted pursuant to the requirements of Paragraph Nos. 89 – 91 of the Commission’s Report and Order (WT Docket No. 01-309), FCC 03-168, released August 14, 2003 (“R&O”).

By way of background information, the Filer is a small, Tier III Commercial Mobile Radio Service licensee, as defined in the Commission’s E-911 Order to Stay, FCC 02-210, released July 26, 2002. The Filer currently provides Broadband PCS service in the Salinas – Monterey, California, San Luis Obispo, California, and Santa Barbara – Santa Maria, California BTAs; with facilities in the remaining two BTAs scheduled to be constructed and operational later this year. The digital portion of the Filer’s wireless system employs the Time Division Multiple Access (“TDMA”) air interface. The Filer currently markets the following TDMA digital wireless telephones: A) Ericsson Models ERIR300, ERIT60D and ERIT61D; B) Nokia Models NOK1260, NOK2260, NOK3560, NOK6360, NOK6560 and NOK8265-B; C) Panasonic Models PAN-EB-TX310, PAN-EB-TX310-T and PAN-EB-TX320; and D) Motorola Models MOT-V601 and MOTC353T. All are tri-mode telephones (i.e., analog cellular, TDMA cellular and TDMA Broadband PCS). Upon information and belief, none of these units meets a U3 rating under ANSI Standard C63.19.

To achieve compliance with the Hearing Aid Compatibility (“HAC”) requirements of the R&O, the Filer is literally at the mercy of the handset manufacturers to develop and market HAC-compliant digital wireless handsets. As a small, Tier III

wireless carrier, the Filer has no influence over the product development and distribution decisions of wireless handset manufacturers; and, accordingly, must rely on the manufacturers to develop HAC-compliant digital wireless handsets for use on the Filer's system.

Given the foregoing, the information requested by the Commission is identified as follows:

Item 1 -- Digital Wireless Phones Tested: The Filer has not tested any digital wireless telephones for HAC compliance. All testing will be performed by the handset manufacturers.

Item 2 -- Laboratory Used: None. See Response to Item 1.

Item 3 -- Test Results For Each Phone Tested: Not applicable. See Response to Item 1.

Item 4 -- Identification Of Compliant Phone Models and Ratings According To ANSI C63.19: Upon information and belief, none of the handsets marketed by the Filer meets a U3 rating under ANSI Standard C63.19.

Item 5 -- Report On The Status Of Product Labeling: None. It is anticipated that product labeling will be handled by the handset manufacturers.

Item 6 -- Report On Outreach Efforts: The Filer is developing a hearing aid compatibility information sheet to assist hearing impaired customers in selecting current model phones and accessories most suitable to their needs.

Item 7 -- Information Related To Retail Availability of Compliant Phones: Upon information and belief, there are currently no handsets commercially available that meet a U3 rating under ANSI Standard C63.19.

Item 8 -- Information Related To Incorporating Hearing Aid Compatibility Features Into Newer Models Of Digital Wireless Phones: The incorporation of HAC features into newer models of digital wireless telephones will be accomplished by the handset manufacturers.

Item 9 -- Any Activities Related To ANSI 63.19 Or Other Standards Work Intended To Promote Compliance With The Requirements Of The Commission's Report and Order: None.

Item 10 -- Total Numbers Of Compliant And Non-Compliant Phone Models Offered As Of The Date Of This Report: Upon information and belief, there are currently no handsets commercially available that meet a U3 rating under ANSI Standard C63.19. The TDMA digital wireless phone models marketed by the Filer are as set forth

in the second paragraph of this report; and, upon information and belief, none of these models meet a U3 rating under ANSI Standard C63 19.

Item 11 -- Any Ongoing Efforts For Interoperability Testing With Hearing Aid Devices. Interoperability testing will be performed by the handset manufacturers.

Very truly yours,

Entertainment Unlimited, Inc.

Dated: 15-13-04

By: 
David Pruett
General Manager

In accordance with Rule Section 1.12, please refer any inquiries or correspondence to:

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