Brookings Municipal Utilities
d/b/a Swiftel Communications
525 Western Avenue
Brookings, SD 57006

November 15, 2004

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

Second Semi-Annual Report

Dear Ms. Dortch:

The Filer, Brookings Municipal Utilities d/b/a Swiftel Communications is the licensee of Stations WPOI260 (A2-Block – partitioned from the Minneapolis – St. Paul MTA) and WPQL803 (B2-Block – partitioned from the Des Moines-Quad Cities MTA) in the broadband Personal Communications Service. 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, 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's wireless system employs a CDMA air interface and is configured to operate as part of the Sprint PCS nationwide network. The Filer currently markets seventeen (17) models of digital wireless handsets. According to information obtained from the Cellular Telecommunications and Internet Association ("CTIA") AccessWireless web site (www.accesswireless.org) and the ATIS HAC Incubator, while there are handsets and devices designed to reduce interference with hearing aids, the Filer has confirmed that as of May 2004, there are no digital wireless handsets commercially available that meet 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: None. As described above, the Filer is a small carrier that is not involved in the handset development or testing process. The Filer will rely on testing 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: The Filer has not identified any commercially available CDMA handsets that meet 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 has developed a hearing aid compatibility information sheet to assist hearing impaired customers in selecting current model phones and accessories most suitable to their needs. This information sheet will also serve to educate the Filer's employees and retail sales force about HAC-related issues and possible solutions. The Filer also plans to coordinate its HAC outreach efforts with those implemented by Sprint PCS.

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. However, once such handsets become commercially available, the Filer will work with Sprint PCS to obtain an appropriate selection of handset models and to market them to current and potential subscribers.

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. The Filer is a small carrier that is not involved in standards development.

Item 10 -- Total Numbers Of Compliant And Non-Compliant Phone Models Offered As Of The Date Of This Report: As noted above, the Filer currently offers seventeen (17) different models of CDMA handsets. Upon information and belief, none of these handsets meet a U3 rating under ANSI Standard C63.19.

Item 11 -- Any Ongoing Efforts For Interoperability Testing With Hearing Aid Devices: None. The Filer is a small carrier that is not involved in handset interoperability testing with hearing aid devices.

For further information concerning participation by Sprint PCS in handset testing and the standards development process, the Filer directs the Commission's attention to the status report that will be filed in WT Docket No. 01-309 by participants in the ATIS HAC Incubator program. Should you have any questions concerning this report, please contact John Prendergast or Cary Mitchell of the law firm of Blooston, Mordkofsky, Dickens, Duffy & Prendergast. Either may be reached by calling (202) 659-0830.

Respectfully submitted,

BROOKINGS MUNICIPAL UTILITIES D/B/A SWIFTEL COMMUNICATIONS

W. James Adkins

Jim Adkins
Operations Manager