

**BUFFALO-LAKE ERIE WIRELESS SYSTEMS CO., L.L.C.**  
4915 Auburn Avenue  
Suite 200  
Bethesda, MD 20814

November 17, 2004

*Via Electronic Comment Filing System*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: Semi-Annual Report  
WT Docket No. 01-309  
Hearing Aid Compatible Digital Wireless Telephones

Dear Ms. Dortch:

Buffalo-Lake Erie Wireless Systems Co., L.L.C. ("BLEW"), hereby files its semi-annual report in response to the Commission's Hearing Aid Compatibility ("HAC") *Report and Order*.<sup>1</sup>

BLEW is a small wireless carrier licensed to provide commercial wireless service in Western New York and Northwestern Pennsylvania pursuant to six broadband Personal Communications Services ("PCS") licenses.<sup>2</sup> BLEW acquired these licenses in December 2003 and launched commercial operations in August 2004. BLEW has agreed to purchase its handsets from Brightpoint, Inc. and has limited ability to influence product development or selection, and must rely instead on the range of commercially available products provided. At present, BLEW sells the following makes and models of digital CDMA wireless handsets: Nokia 2285, Nokia 3586i, Kyocera SE47, an Kyocera KE414. To its knowledge, none of these phones meets a U3 rating under ANSI Standard C63.19.

In the light of the foregoing, BLEW hereby reports the following in response to Commission requirements:

- **Item 1 – Digital Wireless Phones Tested:** BLEW is not a manufacturer, and to date has not tested any digital wireless telephones for HAC-compliance.

---

<sup>1</sup> *Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones*, WT Docket No. 01-309, *Report and Order*, 18 FCC Rcd 16,753 (2003).

<sup>2</sup> *See* Call Signs KNLG725, KNLG727, KNLG728, KNLG730, KNLG731, and KNLG735.

- **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:** To BLEW's knowledge, none of the handsets it sells 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 product manufacturer.
- **Item 6 – Report on Outreach Efforts:** BLEW works with hearing impaired customers to select a phone most suitable to their needs. BLEW will continue and expand these efforts once handsets meeting the U3 rating under ANSI standard C63.19 become commercially available.
- **Item 7 – Information Related to Retail Availability of Compliant Phones:** BLEW is unaware of any commercially available CDMA handset model that meets the 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 C63.19 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:** As referenced above, BLEW currently sells four models of wireless phones. To its knowledge, none of these meet a U3 rating under ANSI Standard C63.19.

Marlene H. Dortch, Secretary  
Federal Communications Commission  
November 17, 2004  
Page 3 of 3

- **Item 11 – Any Ongoing Efforts for Interoperability Testing With Hearing Aid Devices:** BLEW has performed no interoperability testing to date, but anticipates that such testing will be performed by the original equipment manufacturer as it readies HAC-compliant phones for marketing.

Respectfully submitted,

Buffalo-Lake Erie Wireless Systems  
Co., L.L.C.

By: /s/ Andrew Cook  
Andrew Cook  
VP/GM of Operations