

Hearing Aid Compatible Telephones
WT Docket No. 01-309
RM-8658

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Southern Illinois RSA Partnership d/b/a First Cellular of Southern Illinois (“First Cellular”) seeks to avail itself of the temporary relief granting HAC status to dual-mode GSM phones through August 1, 2006, as set forth in *Memorandum Opinion and Order*, WT Docket No. 01-309, FCC 05-166, released September 8, 2005 (“GSM Order”).

(1) Digital wireless phones tested: First Cellular operates a 850 MHz GSM and CDMA system and acquires wireless telephone handsets manufactured by Nokia, Motorola, Audiovox, Sony, Ericsson and Kyocera (collectively, “Vendors”). First Cellular obtains from Motorola and Nokia CDMA hearing aid compatible (HAC) handsets that are rated M3 under standard ANSI C63.19-2005 (“Compliant Phones”). Models tested include Motorola V262 and V710 and Nokia 6015i. First Cellular obtains GSM Compliant Phones from Motorola. Models tested include V220 and V3 Razor.

(2) Laboratory used: First Cellular does not conduct the laboratory testing of handset devices for compliance with the ANSI C63.19 standard. First Cellular relies upon its Vendors to conduct testing and to confirm the compliance rating of each specific handset device.

(3) Test results for each phone tested: The CDMA Compliant Phones deployed by First Cellular have tested positively for M3 compliance. The GSM Compliant Phones deployed by First Cellular have tested positively for M3 compliance in the 1900 MHz band.

(4) Identification of compliant phone models and ratings according to ANSI C63.19: Of the Compliant Phones offered by First Cellular, Motorola V262 and V710 and Nokia 6015i are rated M3 under standard ANSI C63.19-2005 for use on CDMA systems. Motorola models V220 and V3 Razor are rated M3 under standard ANSI C63.19-2005 for use on GSM systems.

(5) Status of product labeling: First Cellular typically relies upon its Vendors to label all products prior to their shipment to the carrier's retail locations. The Compliant Phones offered by First Cellular contain M3 product labeling and additional information.

(6) Outreach efforts: Now that Compliant Phones have become available they are being publicly identified for consumers and audiologists. Compliant phones are listed on First Cellular's web site, and the information is being communicated to consumer groups. First Cellular trains its retail salespeople regarding which digital wireless phones are compliant. Written materials, pamphlets and other promotional literature are provided at the point of sale, addressing the needs of individuals with hearing disabilities. First Cellular conducts a consumer education program aimed at reaching hearing aid and cochlear implant users. Consumers are 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 apply to consumers seeking to obtain Compliant Phones. Toward this end, First Cellular has specifically instructed its sales force to make this policy known to consumers, and to assure that the flexible policy is administered to HAC phone users. Additionally, First Cellular conducts 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. Current technical and anecdotal information is made available to the public regarding the hearing aid compatibility of First Cellular's Compliant Phones in the form of handouts from Motorola and Nokia that are distributed at retail centers and in all communications with the hearing disabilities community.

(7) Retail availability of compliant phones: Compliant Phones are available in all of First Cellular's retail outlets.

(8) Incorporation of hearing aid compatibility features into newer models of digital wireless phones: First Cellular is in contact with its Vendors with regard to their incorporation of HAC features into future CDMA and GSM phones. First Cellular is following its Vendors' efforts to provide dual-band GSM handsets that will be hearing aid-compatible in both the 850 MHz band and the 1900 MHz band.

(9) Activities related to ANSI C63.19 or other standards work intended to promote compliance with the FCC Order: First Cellular is aware that its Vendors are undertaking to comply with the FCC's Order, including the requirements for GSM handsets. First Cellular is ready and willing to offer additional compliant devices to interested customers, and will encourage its Vendors to expedite the availability of advanced handset devices, including handsets rated M3T under standard ANSI C63.19-2005.

(10) Number of compliant and non-compliant phone models offered at this time: First Cellular's core assortment presently includes seven models of CDMA handsets and six models of GSM handsets. Three of the offered CDMA phones are Compliant Phones. Two of the offered GSM phones are Compliant Phones.

(11) Differences in handset offerings among regions in service areas, if any: There are no differences in handset offerings among regions in First Cellular's service area. First Cellular's handset offerings are presently consistent in all markets.

(12) Ongoing efforts for interoperability testing with hearing aid devices: First Cellular will rely mainly upon its Vendor to conduct interoperability testing of Compliant Phones, and will provide to consumers information about those efforts upon request.