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November 17, 2005

Filed Electronically

Ms. Marlene H. Dortch
Secretary of the Commission
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: *Hearing Aid-Compatibility Report (WT Docket No. 01-309)*

Dear Ms. Dortch:

Pursuant to the Commission's *Hearing Aid-Compatibility Report and Order*,¹ attached please find a Hearing Aid-Compatibility Report submitted on behalf of Cellular Phone of Kentucky, Inc.

Please do not hesitate to contact the undersigned with any questions that you may have at (202) 783-4141.

Sincerely,

WILKINSON BARKER KNAUER, LLP

By:



William J. Sill
Nguyen T. Vu

Attachment

¹ 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 16753 (2003).

November 17, 2005

Ms. Marlene H. Dortch
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Semi-Annual Hearing Aid-Compatibility Report (WT Docket No. 01-309)*

Dear Ms. Dortch:

Pursuant to the Commission's *Hearing Aid-Compatibility Report and Order* in the above-referenced docket,¹ attached please find the semi-annual Hearing Aid-Compatibility Report submitted by Cellular Phone of Kentucky, Inc. ("CPK"). CPK is submitting this report in order to provide the Commission with the current status of CPK's efforts and progress it has made toward compliance with the Commission's hearing aid-compatibility requirements.

CPK is the licensee of the B1 portion of the Kentucky 6 – Madison RSA. CPK is a very small Tier III cellular carrier operating a TDMA-based cellular system covering three sparsely populated counties in the state of Kentucky. As such it is dependent on third-party vendors, rather than handset manufacturers for its supply of handsets. Because of CPK's reliance on these third-party vendors, CPK experiences significant delays in obtaining the latest handsets.

Further, as CPK has explained in previous Commission pleadings, CPK initially planned to implement a CDMA overlay in its markets and transition those customers to CDMA technology but has since determined that due to the costs of an overlay, the rural nature of the market, and financial setbacks, such a measure is not economically viable from a business standpoint.² In light of these facts, CPK has no choice but to sell its system.

¹ *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 16753 (2003).

² *See* Cellular Phone of Kentucky, Inc. Petition for Waiver of Section 20.19(c)(2) of the Commission's Rules, WT Docket No. 01-309 (filed Oct. 27, 2005). *See also* Cellular Phone of Kentucky, Inc., Interim Report in CC Docket No. 94-102 (filed Sept. 1, 2005).

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As the Commission is aware, no U3-rated HAC TDMA handsets are commercially available from handset manufacturers or distributors, and equipment vendors have largely discontinued TDMA products.³ Nevertheless, CPK understands that accessories such as the loop-set – a headset that plugs into a handset and is worn around the customer's neck – will facilitate usability between a TDMA handset and a hearing aid containing a telecoil. CPK offers and stocks the Nokia LPS-4 loop-set accessory for its subscribers in all of its retail stores. Finally CPK will continue to monitor developments concerning HAC equipment through its contacts with its vendors and its counsel.

CPK has implemented, and will continue to undertake, the following outreach efforts: (1) CPK made available to its potential subscribers and current subscribers informational literature at its retail store(s) highlighting information regarding hearing aid-compatibility and accessories; and (2) CPK has initiated training sessions for retail employees to make them familiar with CPK's handset accessory offerings.

Respectfully submitted,

WILKINSON BARKER KNAUER, LLP

By: 

William J. Sill
Nguyen T. Vu

³ Section 68.4(a) of the Commission's Rules Governing Hearing-Aid Compatible Telephones, WT Docket No. 01-309, Order on Reconsideration and Further Notice of Proposed Rulemaking, FCC 05-122, at ¶ 48-50 (rel. June 21, 2005).