

EAGLE TELEPHONE SYSTEM, INC.
d/b/a SNAKE RIVER PCS
P.O. Box 178
109 Main Street
Richland, OR 97870

December 1, 2005

Via Electronic Comment Filing System

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

Re: Fourth Semi-Annual Report
WT Docket No. 01-309
HAC Digital Wireless Telephones

Dear Ms. Dortch:

Eagle Telephone System, Inc., d/b/a Snake River PCS (“Eagle”), hereby files its third semi-annual report in response to the Commission’s Hearing Aid Compatibility *Report and Order*.¹

As background, Eagle is a small, rural wireless carrier licensed to operate a commercial wireless network on various disaggregated frequencies in portions of Baker County, Oregon, Union County, Oregon and Wallowa County, Oregon pursuant to three broadband Personal Communications Services (“PCS”) licenses.² Eagle acquired these licenses on December 13, 2000, June 15, 2001 and May 24, 2002, respectively, and launched commercial operations on September 27, 2001. As of this writing, Eagle has approximately 600 subscribers.

Eagle is part of a consortium of small, rural PCS licensees in Oregon and Idaho conducting business under the “Snake River PCS” brand name. As a member of the consortium, Eagle has agreed to purchase all of its handsets directly from Farmers Mutual Telephone Company (“Farmers”), another member of the consortium. As such, Eagle has limited ability to influence product development or selection, and must rely instead on the range of commercially available products purchased by the consortium. At

¹ *Section 68.4(a) of the Commission’s Rules Governing Hearing Aid-Compatible Telephones*, Report and Order, 18 FCC Rcd 16753 (2003).

² See Call Signs WPQT670, WPQS784 and WPUK735.

present, Eagle sells the following makes (and models) of digital CDMA wireless handsets: Kyocera (models KX1 (SoHo), KX2 (KOI), KXP (Milan), KX-13 (Durado) and SE44 (Slider)); LG (model VX3100) and Motorola (M343A, V262, V265 and V710). Five of these phones – the Kyocera KX1 and KX9 and the Motorola V262, V265 and V710 – meet a U3 rating under ANSI Standard C63.19.³

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

- **Item 1 – Digital Wireless Phones Tested:** Eagle is not a manufacturer, and does not purchase phones directly from vendors. Hence, to date, Eagle has not tested any digital wireless telephones for HAC-compliance.
- **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:** Five of the phones it sells 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 consortium's handset vendors.
- **Item 6 – Report on Outreach Efforts:** Eagle works with hearing impaired customers to select a phone most suitable to their needs.
- **Item 7 – Information Related to Retail Availability of Compliant Phones:** Eagle currently sells five models of handsets that meet the U3 rating under ANSI Standard C63.19.

³ *See* Farmers Mutual Telephone Hearing Aid Compatibility Report, WT Docket No. 01-309 (Nov. 17, 2005).

Marlene H. Dortch, Secretary
Federal Communications Commission
December 1, 2005
Page 3 of 3

- **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 manufacturers of CDMA handsets.
- **Item 9 -- Any Activities Related to ANSI C63.19 or Other Standard 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, Eagle currently sells five models of compliant phones.
- **Item 11 – Any Ongoing Efforts for Interoperability Testing With Hearing Aid Devices:** Eagle has performed no interoperability testing to date, but anticipates that such testing will be performed by the consortium's vendors as it readies HAC-compliant phones for marketing.

Respectfully submitted,

Eagle Telephone System, Inc.
d/b/a Snake River PCS

s/
Patrick A. Lattin,
General Manager