

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

Report Date: May 17, 2006

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Cellular South Licenses, Inc. (“Cellular South”) seeks to avail itself of the temporary relief granted to TDMA carriers through September 18, 2006, as set forth in *Order on Reconsideration and Further Notice of Proposed Rulemaking*, WT Docket No. 01-309, FCC 05-122, released June 21, 2005, and codified in amended FCC Rule Section 20.19(c)(2)(i). Cellular South is eligible for TDMA relief because it is conducting a complete overbuild of its entire TDMA network and will complete the overbuild by September 18, 2006. Cellular South offers nine hearing aid-compatible handset models to customers that receive service from the overbuilt (*i.e.*, CDMA) portion of the network, and Cellular South makes available in each retail store it owns or operates these handset models for consumers to test in the store.

- (1) Digital wireless phones tested. Cellular South operates a CDMA/1X and a legacy analog wireless network system. Cellular South purchases wireless telephone handsets that are manufactured by or for Nokia, Motorola, UT Starcom, LG, Kyocera, Palm and Research in Motion (collectively, “Vendors”). Cellular South obtains from Nokia hearing aid compatible (HAC) handsets rated M3 under standard ANSI C63.19-2005 (“Compliant

Phones”). The Nokia models tested are 6015i and 6255i. Cellular South obtains three Compliant Phones from Kyocera. Models tested are KX9c, KX444 and KX5. Cellular South obtains Compliant Phones from other Vendors as well, including the Motorola V3c Razr, the UT Starcom 6700, the Blackberry 7250 and the Palm Treo 650. The Compliant Phones are offered for sale in all retail locations. All Compliant Phones operate on the CDMA system. Vendors of TDMA handsets are not offering any Compliant Phones.

- (2) Laboratory used. Cellular South does not conduct the laboratory testing of handset devices for compliance with the ANSI C63.19 standard. Cellular South relies upon its Vendors to conduct testing and to confirm the compliance of each specific handset device.
- (3) Test results for each phone tested. The Compliant Phones deployed by Cellular South have tested positively for M3 compliance.
- (4) Identification of compliant phone models and ratings according to ANSI C63.19. Of the handsets offered by Cellular South, Nokia models 6015i and 6255i, Kyocera models KX9c, KX444 and KX5, Motorola V3c Razr, UT Starcom 6700, Blackberry 7250 and Palm Treo 650 are rated M3 under standard ANSI C63.19-2005.
- (5) Report on the status of product labeling. Cellular South typically relies upon its Vendors to label all products prior to their shipment to Cellular South’s retail locations. Cellular South will seek to ensure that its Compliant Phones contain M3 product labeling and additional information from the manufacturer.
- (6) Report on outreach efforts. Compliant Phones have are publicly identified for consumers and audiologists. Consumers are given a 30-day trial period within which to try out the digital wireless phone to determine whether they will work properly with their hearing aids. Flexible exchange and return policies apply to consumers seeking to obtain a Compliant Phone. Toward this end, Cellular South 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. Cellular South’s Compliant Phones are listed on Cellular South’s web site, and the information is available to consumer groups upon request. Cellular South trains its retail salespeople regarding which of the digital wireless phones offered are Compliant Phones. Written materials are provided in retail stores at the point of sale, addressing the needs of individuals with hearing disabilities. Cellular South makes information available to hearing aid and cochlear implant users. Upon request, Cellular South assists 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. Technical and anecdotal information is available

to the public regarding the hearing aid compatibility of Cellular South's Compliant Phones.

- (7) Retail availability of Compliant Phones. The Compliant Phones offered by Cellular South are presently available in Cellular South's retail outlets.
- (8) Incorporation of hearing aid compatibility features into newer models of digital wireless phones. Cellular South is in contact with its Vendors with regard to their incorporation of HAC features into future CDMA phones. Cellular South is following its Vendors' efforts to provide additional new handsets that will be hearing aid-compatible. Cellular South plans to add to its assortment of Compliant Phones as new models achieve M3 and M3T ratings.
- (9) Activities related to ANSI C63.19 or other standards work intended to promote compliance with the FCC Order. Cellular South is aware that its Vendors are undertaking to comply with the FCC's requirements to provide Compliant Phones. Cellular South is ready and willing to offer new or 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. Cellular South's core assortment presently includes sixteen models of wireless CDMA handsets. Nine of these are Compliant Phones. No TDMA handsets are offered.
- (11) Differences in handset offerings among regions in service areas. Differences in handset offerings among regions in Cellular South's service area are common, and result from variable sell-through rates, controlled tests designed to demonstrate consumer response to selected new phones, and other factors. Cellular South's core assortment is presently consistent in all markets.
- (12) Ongoing efforts for interoperability testing with hearing aid devices. Cellular South relies mainly upon its Vendors to conduct interoperability testing of Compliant Phones, and provides to consumers information about those efforts upon request.