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May 17, 2006

***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:

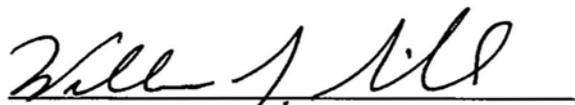
Pursuant to the Commission's *Hearing Aid-Compatibility Report and Order*,<sup>1</sup> attached please find a Hearing Aid-Compatibility Report submitted on behalf of Inland Cellular Telephone Company ("Inland"), the general partner of Eastern Sub-RSA Limited Partnership and Washington RSA No. 8 Limited Partnership.

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. Sil

Attachment

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<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 16753 (2003).

## HEARING AID-COMPATIBILITY STATUS REPORT

May 17, 2006

**Eastern Sub-RSA Limited Partnership**  
Licensee of:

**WA5 (B2) Washington 5 - Kittitas RSA**  
Call Sign: **KNKQ283**

*and*

**Washington RSA No. 8 Limited Partnership**  
Licensee of:

**WA8 (B) Washington 8 - Whitman RSA**  
Call Sign: **KNKN489**

**ID1 (B2) Idaho 1 - Boundary RSA**  
Call Sign: **KNKQ400**

**ID2 (B2) Idaho 2 - Idaho RSA**  
Call Sign: **KNKR305**

Inland Cellular Telephone Company (“Inland”), the general partner of Eastern Sub – RSA Limited Partnership and Washington RSA No. 8 Limited Partnership (collectively “the Partnerships”), hereby provides the Commission with the instant Hearing Aid-Compatibility Status Report (“Report”), as required by the Commission’s *Hearing Aid-Compatible Report and Order*.<sup>1</sup> Inland is submitting this report, on behalf of the Partnerships, in order to provide the Commission with the current status of the Partnerships’ efforts and progress toward compliance with the Commission’s hearing aid-compatibility requirements. The Commission requires Commercial Mobile Radio Service (“CMRS”) carriers that sell digital handsets, to sell hearing aid compatible handsets (“HAC compliant handsets” or “HAC handsets”) that are properly labeled as such.<sup>2</sup> In preparing the instant Report, Inland adhered to the guidelines the Commission set forth in its *Hearing Aid-Compatible Report and Order*.<sup>3</sup>

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<sup>1</sup> See 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) (“*Hearing Aid-Compatible Report and Order*”).

<sup>2</sup> The Commission states that a hearing-aid compatible handset is one that meets the U3 performance rating under the American National Standards Institute (“ANSI”) C63.19 standard. See 47 C.F.R. § 20.19(b)(1).

<sup>3</sup> See *Hearing Aid-Compatible Report and Order*, 18 FCC Rcd at 16787.

**Licensee Name and Contact Information:  
Eastern Sub-RSA Limited Partnership  
Washington RSA No. 8 Limited Partnership**

c/o

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**INTRODUCTION**

As stated in its last Hearing Aid-Compatibility Status Report,<sup>4</sup> the Partnerships, as small “Tier III” carriers, do not purchase a sufficient number of handsets to buy directly from the handset manufacturers. Instead, the Partnerships must rely on ‘middle-men’ or third-party vendors who purchase new handsets from manufacturers and then sell them to small carriers. The Partnerships regularly purchase handsets from the following third-party vendors: Brightpoint, Cellstar, and Brightstar. Currently, the Partnerships stock CDMA handset models from the following equipment manufacturers: Nokia, Kyocera, Motorola, and LG.

Because of the attenuated relationship with equipment manufacturers, the Partnerships are adversely impacted in several respects. First, it is difficult to obtain up-to-the-minute information concerning equipment manufacturers’ planned offerings. Second, prior experience with E911 Phase II ALI equipped handsets has shown that this distant relationship results in the Partnerships not receiving the newer, more desirable handset models until long after the larger CMRS carriers have received them.

Inland, on behalf of the Partnerships, has kept abreast as best it can, with hearing aid-compatible handset offerings. Inland maintains regular contact with third-party vendors and equipment manufacturers, and has again requested the latest information related to the status of manufacturers’ plans to provide HAC compliant handsets. As noted below, presently the Partnerships are able to provide new phone subscribers with an increasing number of HAC-compliant handset models. In addition, Inland continues to implement and refine its customer outreach efforts.

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<sup>4</sup> See Hearing Aid-Compatibility Status Report of Eastern Sub-RSA Limited Partnership and Washington RSA No. 8 Limited Partnership, ET Docket No. 01-309, (filed Nov. 17, 2005) (“November 2005 Status Report”).

## **INFORMATION REQUESTED IN THE *HEARING AID-COMPATIBLE REPORT AND ORDER***

### **1. Digital Wireless Phones Tested**

As discussed at Item 4 below, the Partnerships offer 5 handsets that manufacturers have deemed HAC compliant. Inland has relied on Motorola, Nokia, and Kyocera for compliance with the Commission's Part 2 rules.

### **2. Laboratory Used**

Inland does not know which laboratory or laboratories were utilized by Motorola, Nokia, and Kyocera to obtain HAC handset data. Inland is relying upon representations of equipment vendors and manufacturers that the HAC compliant models discussed in Section 4 are, in fact, HAC compliant.

### **3. Test Results**

Inland has not reviewed Motorola's, Nokia's, and Kyocera's test results but has been informed that the handset phone models discussed in Section 4 are HAC compliant.

### **4. Phone Models which Manufacturers State are Hearing Aid-Compatibility Compliant and ANSI C63.19 Rating:**

Based on Inland's efforts to gather equipment information from its third-party vendors and equipment manufacturers, Inland understands that the three Motorola handsets offered by the Partnerships are HAC compliant. According to Kyocera, its KX5 handset model is HAC compliant, although it has not supplied testing information to the Partnerships regarding this. Lastly, Nokia states that the Nokia 6255i is HAC compliant.

Therefore, the Partnerships offer 5 handsets that are HAC compliant – the Motorola V710, Motorola V266, Motorola V3c, Kyocera KX5, and Nokia 6255i. The Partnerships offer a total of 11 handset models. The 5 HAC compliant handset models account for 42 percent of the handsets offered for sale by the Partnerships.

Inland also understands that along with the HAC compliant Motorola, Nokia, and Kyocera offerings, Motorola offers integrated earpiece speakers ("dynamic speaker") that will couple with, and facilitate usability with, telecoil equipped hearing aids in all its current wireless handsets. In addition, Motorola offers a hands free loop-set accessory. The loop-set is a headset that plugs into a handset and is worn around the subscriber's neck. The loop-set wirelessly retransmits the audio signals through the loop-set back to the hearing aid.

## **5. Product Labeling Information**

The Partnerships are able to provide their subscribers with new handsets through their retail cellular stores and through third-party agents that sell the handset manufacturers' products.<sup>5</sup> The Partnerships understand and will continue to comply with the Commission's requirement that service providers ensure that information concerning HAC compliant handsets, and more particularly a handset's U-Rating, is made visible to their subscribers via a label on the box and in product manuals. Also, the Partnerships have signage prominently displayed at their retail locations which identify HAC handsets.

## **6. Outreach Efforts**

Since filing their November 17<sup>th</sup> Status Report with the Commission, the Partnerships have continued to train their retail employees to identify and provide information regarding hearing HAC compliant handsets and accessories, such as the loop-set accessory, to the Partnerships' current and prospective subscribers. The Partnerships believe that one of the most effective ways to disseminate information to its consumers is at the point of sale. The Partnerships will continue to educate their retail staff on HAC issues and the developing technology offered through the equipment manufacturers, so that their retail staff can continue to function as a source of reliable and current information.

The Partnerships will continue to build on their efforts to educate both their potential subscribers and their current subscribers on the HAC compliant handsets being offered:

- The Partnerships continue to supply their retail staff with informational materials concerning the compliant handsets and accessories. The Partnerships continue to provide informational literature at the Partnerships' retail stores concerning compliant handsets and accessories as it becomes available and the number of HAC compliant phones increases;
- Inland continues to regularly update its web site as new HAC handset information becomes available, calling attention to the HAC compliant handsets and accessories; and
- The Partnerships' staff has been instructed to direct interested customers at point of sale stations to access Inland's HAC web pages via in-store computers. Additionally, signs have been installed at each point of sale station with updated information about HAC compliant handsets and accessories.

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<sup>5</sup> The Partnerships' agents generally sell Partnership provided handsets.

## **7. Retail Availability of Compliant Phones**

The Partnerships have at least one of each of the 5 HAC compliant handsets active and available for customers to try out in each store. This allows customers to try each phone before they purchase in order to easily find the HAC option that is best for them. As noted above, of the 11 current handset models the Partnerships presently offer, 5 models are, according to their manufacturers, HAC compliant.<sup>6</sup> Additionally as noted above, the Partnerships continue to offer Motorola handsets that have dynamic speakers which Motorola states renders it compatible with telecoil equipped hearing aids.

## **8. Efforts to Incorporate Hearing Aid-Compatibility into Newer Models**

As noted above, Inland understands that all of the Motorola handsets it sells, the Kyocera KX5, and the Nokia 6255i handset are HAC compliant. In addition, the Partnerships offer the Motorola H500, H300, and H700 headsets with integrated dynamic speakers that will allow for coupling with hearing aid telecoils making the handsets compatible with these hearing aids.

## **9. Activities Related to ANSI C63.19 or other Standards of Work**

Inland and the Partnerships will continue to keep abreast of developments in HAC handsets through third-party vendors, review of manufacturers' publicly available documents, consultation with its counsel, and interfacing with industry organizations of which Inland is a member.

## **10. Total Numbers of Compliant and Non-Compliant Models Offered as of May 17, 2006**

As noted above, of the 11 current handset models the Partnerships presently offer, 5 handset models are, according to their manufacturers, HAC compliant. The Partnerships calculate that approximately 42 percent of the models available to new subscribers are HAC compliant handset models. Additionally, the percentage of handset models provided to new subscribers should continue to increase as the Partnerships add the new models that will soon be available.

The remaining 6 handset models offered by the Partnerships are not HAC compliant. There are several different types of accessories, however, that can be used to make non-compliant handsets more usable with hearing aids. Based on its review of available literature, the Partnerships believe that many of their other handset offerings would be usable with loop-sets as well as with the Plantronic's hands-free headset.<sup>7</sup> The Partnerships currently offer both these accessories to their subscribers. The Partnerships

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<sup>6</sup> Several discontinued handset models, however, are still available in limited numbers for purchase by subscribers until the Partnerships' in-stock supply runs out, but the Partnerships are not actively marketing these handsets.

<sup>7</sup> Plantronic's hands-free headset, which is similar in function to a loop-set, appears to be compatible with telecoil-equipped hearing aids.

also offer the Hearing Aid Telephone Interconnect System (“HATIS”) as an accessory for subscribers with hearing aids.<sup>8</sup>

**11. Ongoing Efforts for Interoperability Testing with Hearing Aids:**

Because the Partnerships are Tier III carriers, they are reliant upon handset manufacturers and industry standards groups to work towards a standard for interoperability testing as well as to conduct such tests.

**12. Information Regarding Differences in Handset Offerings Among Regions in Service Areas:**

The Partnerships are small carriers with four systems located in two adjacent states. To date, there does not appear to be any discrepancies in the handset offerings between the four systems.

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<sup>8</sup> The HATIS is a small device that fits over the subscriber’s ear next to the hearing aid and plugs directly into the audio jack of a wireless handset.