

South Slope Cooperative Telephone Company
d/b/a South Slope Wireless
980 North Front, PO Box 19
North Liberty, IA 52317

November 14, 2006

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 – 12th Street, S.W.
Washington, D.C. 20554

Re: WT Docket No. 01-309
HAC Digital Wireless Telephones

Sixth Semi-Annual Report

Dear Ms. Dortch:

South Slope Cooperative Telephone Company - d/b/a South Slope Wireless ("South Slope") is the licensee of Broadband PCS Stations WPOL801 (A-Block, Partitioned Submarket 82, – Des Moines-Quad Cities MTA), WPOL802 (A-Block, Partitioned Submarket 86, – Des Moines-Quad Cities MTA), WPSF627 (A-Block, Partitioned Submarket 222, – Des Moines-Quad Cities MTA), WPWM732 (A-Block, Partitioned Submarket 262, – Des Moines-Quad Cities MTA) and WPZU774 (A-Block, Partitioned Submarket 270, – Des Moines-Quad Cities MTA). This report is submitted pursuant to the requirements of Paragraph Nos. 89 – 91 of the Commission's *Report and Order* (WT Docket No. 01-309), FCC 03-168, released August 14, 2003 ("R&O").

By way of background, South Slope is a small, Tier III Commercial Mobile Radio Service licensee, as defined in the Commission's E-911 *Order to Stay*, FCC 02-210, released July 26, 2002. South Slope's wireless system employs a GSM air interface and is configured to operate as part of the *i wireless* network. *i wireless* is headquartered in Urbandale, Iowa, and is a partnership between T-Mobile USA and Iowa Network Services ("INS").

South Slope currently markets a variety of Motorola and Nokia digital wireless handset models, among others. Of the twelve (12) handset models that South Slope is currently selling, at least three (3) handsets have received an M3 rating under ANSI Standard C63.19 – the Nokia 6061 (FCC ID: QTLRH-74) the Motorola V3 (FCC ID: IHDT56EU1) and the Motorola V3 (FCC ID: IHDT56GW1). As for the more recent requirement that each provider of public mobile service include among its handset offerings at least two models for each air interface that comply with Rule Section 20.19(b)(2) (*i.e.*, that have received a rating of T3 or better for inductive coupling), South Slope and its counsel have only been able to identify a handful of GSM handset models that are compliant with this standard. Because these handsets were not available to South Slope prior to the September 18, 2006 regulatory compliance deadline, South Slope was

forced to seek a temporary waiver or stay of this requirement in a petition that was filed in WT Docket 01-309.¹ South Slope has since obtained a supply of Motorola V3i handsets (FCC ID: IHDT56GW1) that have received a T3 rating.

As a small, Tier III wireless carrier, South Slope has no influence over the product development and distribution decisions of wireless handset manufacturers; and it must rely on the manufacturers to develop HAC-compliant digital wireless handsets for its system. Given the foregoing, the information requested by the Commission is identified as follows:

Item 1 -- Digital Wireless Phones Tested: None. As described above, South Slope is a small carrier that is not involved in the handset development or testing process. The Company will rely on testing performed by the handset manufacturers.

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: As noted above, South Slope is currently selling at least three (3) handsets have received an M3 rating under ANSI Standard C63.19 – the Nokia 6061 (FCC ID: QTLRH-74) the Motorola V3 (FCC ID: IHDT56EU1) and the Motorola V3 (FCC ID: IHDT56GW1). Moreover, Since filing its request for temporary waiver or temporary stay on September 18, 2006, South Slope has obtained a number of Motorola V3i handsets (FCC ID: IHDT56GW1) that have apparently received a T3 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 handset manufacturers. In this regard, South Slope understands that **Motorola** and **Nokia** have been active on the ATIS Incubator for Hearing Aid Compatibility. Both companies participate in ATIS Working Group 6, which is addressing labeling and educational insert language issues. Working Group 6 is comprised of wireless manufacturers, carriers, and hearing-impaired user representatives, and is focused on creating a standard format for HAC labeling per FCC regulations that will educate consumers and allow hearing-impaired advocates to assist in consumer education.

In addition, we are aware that some confusion may arise regarding the handset labeling standards contained in the 2001 and draft 2005 version of the C63.19 standard, which specify different letter designations for HAC compliance. However, we are aware that some confusion may arise regarding the handset labeling standards contained in the 2001 and draft 2005 version of the C63.19 standard, which specify different letter

¹ *See* South Slope Cooperative Telephone Co. d/b/a South Slope Wireless *Petition for Temporary Waiver or Temporary Stay*, WT Docket No. 01-309 (*filed* September 18, 2006).

designations for HAC compliance. While the 2001 version of the C63.19 standard uses a "U" rating for radiofrequency (RF) immunity and a "UT" rating for acoustic coupling, the 2005 version uses labeling that is consistent with the switches on hearing aids (*i.e.*, specifying "M" for Microphone and "T" for T-Coil). Accordingly, all compliant handsets offered by the Filer will be labeled with the "M" and "T" ratings associated with the 2005 draft version of the ANSI technical standard, as appropriate.²

Item 6 -- Report On Outreach Efforts: South Slope has developed a hearing aid compatibility information sheet to assist hearing impaired customers in selecting current model phones and accessories most suitable to their needs. This information sheet will also serve to educate the company's employees and retail sales force about HAC-related issues and possible solutions. South Slope also understands that **Motorola** and **Nokia** have been involved in various outreach activities and each have developed web sites devoted to providing additional information about HAC. Links to these sites are provided below:

<http://www.motorola.com/consumer/accessibility>.

<http://www.nokiaaccessibility.com/>

Item 7 -- Information Related To Retail Availability of Compliant Phones: Upon information and belief, there are currently only a handful of GSM handset models that have received a T3 rating or better under ANSI Standard C63.19. Only one such handset – the Motorola V3i – is currently available to South Slope. Once such handsets become more widely available, South Slope will work with *i wireless* and T-Mobile to obtain an appropriate selection of handset models and to market them to current and potential subscribers. In the meantime, South Slope currently has three (3) models of GSM handsets in stock and commercially available that have achieved an M3 rating or better. Moreover, all of the handsets that *i wireless* carries have available accessories (adapters and neck loops) that allow the handsets to be used with TTY/TDD devices and hearing aids.

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 handset manufacturers.

Item 9 -- Any Activities Related To ANSI 63.19 Or Other Standards Work Intended To Promote Compliance With The Requirements Of The Commission's Report and Order: None. The Filer is a small carrier that is not involved in standards development.

² See In the Matter of Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones, *Order on Reconsideration and Further Notice of Proposed Rule Making*, 36 CR 190, 20 FCC Rcd 11221 at ¶¶ 33-36 (2005).

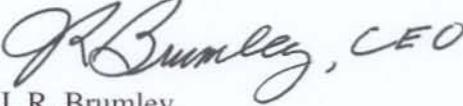
Item 10 -- Total Numbers Of Compliant And Non-Compliant Phone Models Offered As Of The Date Of This Report: As noted above, South Slope currently offers a selection of twelve (12) GSM handset models. Upon information and belief, only one these handsets – the Motorola V3i – meets a T3 rating under ANSI Standard C63.19. Three (3) handset models, the Motorola V220, the Motorola V3 and the Motorola V3i, have achieved an M3 rating or better. In addition, all of the handsets offered by South Slope have available accessories (adapters and neck loops) that allow the handsets to be used with TTY/TDD devices and hearing aids.

Item 11 -- Any Ongoing Efforts For Interoperability Testing With Hearing Aid Devices: None. South Slope is a small carrier that is not involved in handset interoperability testing with hearing aid devices.

Should you have any questions concerning this report, please contact John Prendergast or Cary Mitchell of the law firm of Blooston, Mordkofsky, Dickens, Duffy & Prendergast. Either may be reached by calling (202) 659-0830.

Respectfully submitted,

**SOUTH SLOPE COOPERATIVE TELEPHONE
COMPANY D/B/A SOUTH SLOPE WIRELESS**


J. R. Brumley