

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C, 20554**

In the Matter of	)	
	)	
	)	
Section 68.4(a) of the Commission’s Rules	)	WT Docket No. 01-309
Governing Hearing Aid-Compatible	)	RM-8658
Telephones	)	
	)	

**SEMI-ANNUAL REPORT**

PetroCom License Corporation (“PetroCom”), by its attorneys, and pursuant to the Order adopted by the Federal Communications Commission (“FCC” or “Commission”) in the above referenced proceeding on August 14, 2003,<sup>1/</sup> and the Public Notice released by the FCC on March 8, 2004,<sup>2/</sup> hereby submits its semi-annual report regarding interoperability between certain digital wireless phones and hearing aids.

**I. INTRODUCTION**

PetroCom provides cellular services in the Gulf of Mexico (the “Gulf”) from areas offshore from Brownsville, Texas to Mobile, Alabama. In the fall of 2004, PetroCom completed construction of the first digital cellular network in the Gulf of Mexico. The network employs Global System for Mobile Communications (“GSM”) technology to provide enhanced, secure, and high-speed communications for companies in the offshore industry. The network also employs Enhanced Data rates for GSM Evolution (“EDGE”) technology to enable the

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

<sup>2/</sup> Wireless Telecommunications Bureau Announces Hearing Aid Compatibility Reporting Dates for Wireless Carriers and Handset Manufacturers, WT Docket No. 01-309, Public Notice, DA 04-630 (rel. March 8, 2004) (“*HAC PN*”).

delivery of advanced mobile data services, including high-speed Internet access, video downloading, and full multimedia messaging.

## II. SEMI-ANNUAL REPORT

Customers of PetroCom's digital network -- the only digital cellular network in the Gulf - operate GSM digital wireless handsets. PetroCom generally offers its customers GSM handset models from Nokia, Motorola and Sony Ericsson. Pursuant to Section 20.19(c)(2)(i) of the Commission's rules, carriers were required to make available two models of HAC compliant handsets by September 16, 2005.<sup>3/</sup> On September 8, 2005, the FCC released the *GSM Waiver Order* which adopted the recommendation of the HAC Incubator Working Group 9 to accept, until August 1, 2006, the HAC compliance rating for 1900 MHz handset operation as the overall compliance rating for GSM digital wireless dual band handsets.<sup>4/</sup> The *Order* effectively designated dual band handsets as HAC compliant when only the 1900 MHz band operations meet the HAC ratings standard. Based on the *Order*, PetroCom met the requirements of Section 20.19(c)(2)(i).<sup>5/</sup>

As noted above, as of August 1, 2006, carriers are obligated to meet the HAC compliance requirements without relying on the compliance rating for 1900 MHz handset operation as the overall compliance rating for GSM digital wireless dual band handsets. According to

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<sup>3/</sup> 47 C.F.R. 20.19(c)(2)(i).

<sup>4/</sup> Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones, *Memorandum Opinion and Order*, 20 FCC Rcd. 15108 (2005) ("GSM Waiver Order" or "Order").

<sup>5/</sup> Although the rules required carriers to offer HAC compatible handsets by September 16, 2005, PetroCom offered those handsets by October 31, 2005. Due to PetroCom's status as a carrier affected by Hurricane Katrina, PetroCom's deadline for meeting this obligation was extended until October 31, 2005. See Wireless Telecommunications Bureau Announces Extension of Filing and Regulatory Deadlines for Wireless Licensees in Areas Impacted by Hurricane Katrina, Public Notice, DA 05-2406 (rel. September 1, 2005); Extending Filing and Regulatory Deadlines for Wireless Licensees in Areas Impacted by Hurricanes Katrina and Rita, Public Notice, DA 05-2744 (rel. October 21, 2005). PetroCom began offering these handsets by October 31, 2005, and is in compliance with Section 20.19(c)(2)(i) of the Commission's rules.

PetroCom's vendor, the two models offered by PetroCom - the Motorola V220 and Motorola V3 - are rated M3T under the standard ANSI C63-19-2005, which meets the Commission's current hearing aid compatibility requirements (and does not rely on compliance rating for 1900 MHz handset operation as the overall compliance rating for GSM digital wireless dual band handsets).

Through its website, PetroCom has made available information regarding its two HAC compliant handsets it offers to customers.<sup>6/</sup> Because of the nature of PetroCom's operations (pursuant to which it generally sells to corporate, as opposed to individual, customers), it does not maintain retail outlets from which it sells handsets. Instead, handsets are generally sold via telephone. PetroCom's website and customer service specialists educate customers regarding the available HAC compliant handsets. Furthermore, PetroCom's staff works with customers with disabilities to ensure that those customers obtain a digital handset that meets the customer's needs. After a customer places an order, PetroCom can, within 24 hours, obtain the requested handset from its third party vendor. Therefore, PetroCom meets the obligations of Section 20.19(c)(2)(i) of the Commission's rules because it now provides two HAC compliant handsets to its customers and markets those handsets through its website and customer service representatives.

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<sup>6/</sup> See PetroCom - Phones and Devices, <http://www.petrocom.com/phones.asp>.

### III. CONCLUSION

PetroCom hereby submits the foregoing semi-annual report regarding its compliance with the FCC's HAC requirements. PetroCom will provide the FCC with updated information in future reports. Please direct any questions regarding the report to the undersigned.

Respectfully submitted,

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