

**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 Telephones)	RM-8658

Hearing Aid Compatibility Report

Advantage Cellular Systems, Inc. d/b/a DTC Wireless (“Advantage”), by its attorneys, pursuant to the Federal Communications Commission’s (“Commission” or “FCC”) *Order* in WT Docket No. 01-309,¹ and the subsequent *Public Notice* in the same proceeding,² hereby files its Sixth Report detailing its efforts towards compliance with the FCC’s hearing aid compatibility requirements. Advantage is including in its Sixth Report all information of which it has knowledge, but does not address those reporting requirements in the *Order* that can be adequately answered only by the individual handset manufacturers.

I. Carrier Background

Advantage is a small carrier that provides Commercial Mobile Radio Service (“CMRS”) in Tennessee utilizing the GSM air interface.

II. Handsets Currently Offered for Sale

Advantage currently offers for sale handsets manufactured by LG, Motorola, Nokia and Samsung. The specific handset models are the LG 1400i and F9100; Motorola V3, V190, V220, V361, C139, Slvr, PEBL, and V235; Nokia 3120, 6010, 6103, and 6102(h); and Samsung 317 and X496. The LG 1400i, Motorola V3, V220; and Nokia 6103 and 6102(h) have been certified by the FCC’s Office of Engineering and Technology as M-rated hearing aid compatible (HAC) compliant. The LG 1400i is also T-rated HAC compliant. On September 14, 2006, Advantage requested a temporary and limited waiver of Section 20.19(d)(2) of the Commission’s rules until January 1, 2007 in order to gain more time to acquire and begin selling the required number of T-coil (“T-rated”) HAC-compliant handsets. Advantage’s January 1, 2007 timetable for T-rated

¹ In the Matter of Section 68.4(a) of the Commission’s Rules Governing Hearing Aid-Compatible Telephones, *Report and Order*, WT Docket No. 01-309 (August 14, 2003) (“*Order*”).

² Wireless Telecommunications Bureau Announces Hearing Aid Compatibility Reporting Dates for Wireless Carriers and Handset Manufacturers, *Public Notice*, WT Docket No. 01-309 (March 8, 2004) (“*Public Notice*”).

compliance is based on its experiences and contacts with manufacturers and distributors and publicly available information regarding handset availability.

III. Hearing Aid Compatible Handset Labeling/Insert Requirement

Of the handsets offered by Advantage, only the LG 1400i has a label attached on the handset's packaging indicating the U-rating of the wireless telephone. Of the handsets offered by Advantage only the Motorola V3, V190, V220 and V555; Nokia 3120 and 6102(h); and Samsung 317 and X496 contain an insert describing the U-rating system.

IV. Outreach Efforts

Advantage offers to its sales staff, subscribers and the general public current information regarding the HAC functionality of GSM handsets that it offers for sale, including providing customers with a list of hearing aid compatible handsets. In addition, Advantage has printed fact sheets that answer frequently asked questions and provide consumers with tips on finding a HAC handset that meets their needs. Finally, Advantage has adopted a flexible no questions asked return policy for consumers seeking to obtain hearing aid compatible GSM digital wireless handsets.

Respectfully submitted,
Advantage Cellular Systems, Inc.
d/b/a DTC Wireless

Dated: November 17, 2006

_____/s/
Michael R. Bennet
Kenneth C. Johnson
Bennet & Bennet, PLLC
10 G Street, NE
7th Floor
Washington, D.C. 20002
(202) 371-1500

Its Attorneys