

**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

Thumb Cellular LLC (“Reporter”), a digital wireless service provider, pursuant to the Federal Communications Commission’s (“Commission” or “FCC”) *Order* in WT Docket No. 07-309, FCC 03-168, 29 CR 1299 (August 14, 2003), hereby files a report concerning the availability of digital phones for the hearing impaired and, if the Commission agrees that Reporter’s handsets are fully HAC compliant, Reporter withdraws its request for a waiver of 47 C.F.R. § 20.19(d)(2).¹ This report does not address the reporting requirements of the *Order* which are properly addressed by handset manufacturers who are in the best position to report about their own activities.

I. Carrier Information

¹ On July 7, 2004 the FCC published notice that it had obtained OMB approval to collect hearing aid compatibility reports from wireless carriers. 69 Fed. Reg. 40928 (Wednesday, July 7, 2004). Pursuant to the *Report and Order, Amendment of Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones*, 68 Fed. Reg. 54173 (September 16, 2003), reports are due every six months after rule effectiveness for the first three years and then annually for the next two years. The first reports were filed in November 2004.

Reporter is a small Commercial Mobile Radio Services carrier that provides service in Michigan. Reporter has received several requests for a HAC-compliant handset.

II. Handset Discussion

Reporter has researched information for various manufacturers including Motorola, Nokia, LG, and Kyocera regarding HAC-compliant handsets. Presented below is a listing of the handsets which Reporter carries. While Reporter has been unable to determine the HAC compliance for several of its handsets, the listing shows that Reporter carries more than two (2) handsets which are at least M and T compliant.

Handset	M-Rating (radio frequency interference)	T-Rating (inductive)
Kyocera KX12	Unknown (waiting for answer from Kyocera)	Unknown
Kyocera Strobe	Unknown (waiting for answer from Kyocera)	Unknown
LG5000	M3 (according to phonescoop.com)	None
Motorola V265	M3 (according to phonescoop.com)	None
Motorola V323i	M4 (printed on phone box)	T4 (printed on phone box)
Motorola V710	M3 (printed on phone box)	None
Motorola K1m (Krazr)	M4 (printed on phone box)	T4 (printed on phone box)
Motorola L7c (Slvr)	M4 (printed on phone box)	T4 (printed on phone box)
Motorola V3c (Razr)	M3 (printed on phone box)	None
Motorola V3m (Razr)	M4 (printed on phone box)	T4 (printed on phone box)
Motorola W315	M3 (printed on phone box)	None
Nokia 2865i	M3 (printed on phone box)	None
Nokia 6015i	M3 (printed on phone box)	None
Nokia 6165i	M4 (printed on phone box)	T4 (printed on phone box)
Nokia 6265i	M3 (printed on phone box)	T4 (printed on phone box)

III. Hearing Aid Compatible Handset Labeling/Insert Requirement

The HAC-compliant phones which are distributed by Reporter contain an information sheet or instruction manual which describes the HAC capabilities of the handsets. As shown in the table above, most of the boxes containing the HAC-compliant are marked with a HAC capability notice..

IV. Outreach Efforts & Interoperability

Reporter has tested the HAC-compliant handsets which are distributed by it and they work well throughout Reporter's service area. Reporter makes reasonably available to disabled subscribers and disabled potential subscribers of HAC-compliant, via the retail handset distribution facility, current technical and anecdotal information regarding the hearing aid compatibility of specific wireless handsets including both HAC-compliant and non-HAC-compliant handsets.

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Respectfully Submitted,
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