

In the Matter of)	
)	
Section 68.4(a) of the Commission's Rules)	WT Docket No. 01-309
Governing Hearing Aid)	RM-8658
Compatible Telephones)	FCC R&O 03-168
)	

PETITION
OF
AMERICAN NATIONAL STANDARDS INSTITUTE
ACCREDITED STANDARDS COMMITTEE C63™ (EMC)
ANSI ASC C63™

American National Standards Institute Accredited Standards Committee C63™ (ANSI ASC C63™) for ElectroMagnetic Compatibility (EMC) is pleased to provide this petition¹ to the FCC (Commission) requesting that the revision of ANS C63.19, American National Standard for Methods of Measurement and Compatibility between Wireless Communication Devices and Hearing Aids, ANS C63.19-2007, which has recently been successfully balloted and undergone the ANSI public review process,² be adopted in place of the 2001 and 2006 version of this document. After the successful revision of ANS C63.19-2001, issued as ANS C63.19-2006, an amendment was prepared to address further issues with the

¹ This petition is in response to FCC 03-168, paragraph 63:
63. Accordingly, we are adopting certain performance standards contained in the 2001 version of ANSI C63.19 as the applicable technical standard for wireless hearing aid compatibility. We encourage ANSI to work with the relevant stakeholders to review the standard periodically to determine whether improvements to the standard are warranted. ANSI should submit any revisions to the standard to the FCC for consideration of whether to incorporate the modified standard into FCC rules. To help ensure that our rules continue to reflect the current standard, we delegate to the Chief, Wireless Telecommunications Bureau, in coordination with Chief, Office of Engineering and Technology, the authority to approve future versions of ANSI C63.19 to the extent that the changes to the standard do not raise major compliance issues. At the same time, we recognize the necessity to provide opportunity for notice and comment on any changes or modifications that could affect compliance with our regulations. In cases, therefore, where major changes have been made that could affect compliance, the Commission will initiate an appropriate rulemaking proceeding to consider adoption of updated versions.

² ANSI C63.19 has been undergoing revision for some time. Draft revision 3.10 successfully completed ANSI ASC C63 balloting and the result, draft revision 3.12 made available to the public through the IEEE webstore at <http://standards.ieee.org>. It has been forwarded to ANSI, which conducted a public review in which no comments were returned. The draft document hence has been submitted to ANSI for approval as an ANSI standard, which is anticipated in the near future.

standard. This amendment has now been completed and will be incorporated into ANS C63.19 after approval by ANSI, and published as ANS C63.19-2007.

On August 14, 2003, the Commission released its Report and Order, issued in the above-captioned docket, regarding the rules governing Hearing Aid Compatibility (HAC) for mobile phones.³ In this order, ANS C63.19-2001 was adopted as the test standard to be used in demonstrating compliance with the provisions of this rule. Subsequently the ANSI ASC C63™ Working Group for ANS C63.19 completed a revision to this standard to reflect changes in technology, and efficiencies and improvements in testing procedures, that have been identified since the time of the 2001 version's preparation. Now further improvements have been made and a 2007 version of the standard is being prepared for publication.

Participation has been diverse with representatives from the telecommunications industry, manufacturers of hearing aids and mobile handsets, service providers, consumers, test laboratories and federal agencies directly interested in this subject. The released-document received a 100% affirmative vote in its final recirculation ballot.⁴ ANSI then held a 45 day public review period. No comments were received during this public review. The ASC C63™ secretary has sent to ANSI the required documentation requesting approval of the C63.19 Amendment. Once ANSI approves the document, the standard will be published by the IEEE as ANS C63.19-2007.

We believe this revision represents a substantial improvement over the 2006 version and therefore recommend that this new version be adopted in place of the previous versions.

³ See 47 U.S.C. §610(b)(2)(B)

Respectfully submitted,

ANSI ASC C63™

A handwritten signature in black ink that reads "Donald N. Heirman" followed by a long horizontal flourish.

Mr. Donald N. Heirman
Chair, ANSI ASC C63™

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4 There were no negative ballots or abstentions in the final recirculation of the amendment to ANS C63.19.