

Hearing Aid Compatible Telephones  
WT Docket No. 01-309  
RM-8658

Report Date: November 16, 2007

Carrier Name, Address, Phone, Contact Person:

Union Telephone Company  
P. O. Box 160  
850 N. State Hwy 414  
Mountain View, Wyoming 82939  
Contact: Todd Crook, Product Manager  
(307) 782-4322

Counsel: Lukas, Nace, Gutierrez & Sachs  
Pamela Gist, Esq.  
1650 Tysons Blvd., Suite 1500  
McLean, Virginia 22102  
Ph. (703) 584-8665  
Email: pgist@fcclaw.com

(1) Digital wireless phones tested: Union Telephone Company (“Union”) operates a GSM wireless system and acquires telephone handsets manufactured by Nokia, Samsung, Sony Ericsson, and Motorola (collectively, “Vendors”).

M3 Phones - Union obtains from Sony Ericsson and Nokia hearing aid compatible (HAC) handsets rated M3 under standard ANSI C63.19-2005 in both the 850 and 1900 MHz bands. Models tested include Nokia 6085 (FCCID – LJPRM-198H), Sony Ericsson s500i (FCCID - PY7A1052041), and the Sony Ericsson w580i (FCCID – PY7A1052042).

T3 Phones - Union obtains from Nokia and Sony Ericsson hearing aid compatible (HAC) handsets that are currently being tested for compliance for T3 rating under standard ANSI C63.19-2005 in both the 850 and 1900 MHz bands. Models tested include Nokia 6085 (FCCID – LJPRM-198H), Sony Ericsson s500i (FCCID - PY7A1052041), and the Sony Ericsson w580i (FCCID – PY7A1052042).

(2) Laboratory used: Union does not conduct the laboratory testing of handset devices for compliance with the ANSI C63.19 standard. Union relies upon its Vendors to conduct testing and to confirm the compliance of each specific handset device.

(3) Test results for each phone tested: The Compliant Phones deployed by Union have tested successfully for both M3 and T3 compliance.

(4) Identification of compliant phone models and ratings according to ANSI C63.19: Of the handsets offered by Union, the Nokia 6085 (FCCID – LJPRM-198H), Sony Ericsson s500i (FCCID - PY7A1052041), and the Sony Ericsson w580i (FCCID – PY7A1052042) are rated both M3 and T3.

(5) Status of product labeling: Union typically relies upon its Vendors to label all products prior to their shipment to Union's retail locations. The Compliant Phones offered by Union contain M3 and T3 product labeling and additional information.

(6) Outreach efforts: Compliant Phones are being publicly identified for consumers and audiologists. Compliant phones are listed on Union's web sites, and the information is being communicated to consumer groups. Union trains its retail salespeople regarding which digital wireless phones are compliant. Written materials, pamphlets and other promotional literature are provided at the point of sale, addressing the needs of individuals with hearing disabilities. Consumers are given a thirty-day trial period within which to try out digital wireless phones to determine whether they will work properly with their hearing aids. Flexible return policies apply to consumers seeking to obtain Compliant Phones. Toward this end, Union has specifically instructed its sales force to make this policy known to consumers, and to assure that the flexible policy is administered to HAC phone users.

(7) Retail availability of compliant phones: Compliant Phones are available in all of Union's retail outlets.

(8) Incorporation of hearing aid compatibility features into newer models of digital wireless phones: Union is in contact with its Vendors with regard to their incorporation of HAC features into future GSM phones. Union is following its Vendors' efforts to provide additional GSM handsets that will be hearing aid-compatible. Union plans to add to its assortment of Compliant Phones as new models achieve M3 and T3 ratings.

9) Activities related to ANSI C63.19 or other standards work intended to promote compliance with the FCC Order: Union is aware that its Vendors are undertaking to comply with FCC requirements to provide Compliant Phones. Union is ready and willing to offer additional compliant devices to interested customers, and will encourage its Vendors to expedite the availability of advanced handset devices.

(10) Number of compliant and non-compliant phone models offered at this time: Union's core assortment presently includes ten models of GSM handsets. Three of these are M3 Compliant Phones and three are T3 Compliant Phones.

(11) Differences in handset offerings among regions in service areas, if any:  
There are no differences in handset offerings among regions in Union's service area. Union's handset offerings are presently consistent in all markets.

(12) Ongoing efforts for interoperability testing with hearing aid devices: Union will rely mainly upon its Vendors to conduct interoperability testing of Compliant Phones, and will provide to consumers information about those efforts upon request.