



November 15, 2007

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 – 12th Street, S.W.
Washington, D.C. 20554

***Re: WT Docket No. 01-309
HAC Digital Wireless Telephones***

Annual Report - 2007

Dear Ms. Dortch:

Whidbey Telephone Company (“Whidbey”), is the licensee of Station KNLG248 (F Block – Aberdeen, Washington BTA) and Station KNLG517 (D Block – Port Angeles, Washington BTA) in the Broadband Personal Communications Service. This report is submitted pursuant to the requirements of Paragraph Nos. 89 – 91 of the Commission’s *Report and Order* (WT Docket No. 01-309), FCC 03-168, released August 14, 2003 (“*R&O*”).

By way of background, Whidbey is a small, Tier III Commercial Mobile Radio Service licensee, as defined in the Commission’s E-911 *Order to Stay*, FCC 02-210, released July 26, 2002. Whidbey’s broadband PCS systems employ a GSM air interface. Because Whidbey offers two or fewer digital wireless handsets in the U.S., Whidbey qualifies for the *de minimis* exception to the Hearing Aid Compatibility (“HAC”) rules, described in Rule Section 20.19 (e)(1).

Should you have any questions, please contact John Prendergast or Cary Mitchell of the law firm of Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP. Either may be reached by calling (202) 659-0830.

Respectfully submitted,

WHIDBEY TELEPHONE COMPANY

Marion F. Henny
President