

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

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Carrier Name, Address, Phone, Contact Person:

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Collectively referred to as "Bluegrass Cellular"

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(1) Digital wireless phones tested: Bluegrass Cellular operates a CDMA wireless telecommunications system and acquires wireless digital telephone handsets manufactured by Nokia, Motorola, Kyocera, Samsung and LG (collectively, "Vendors"). The HAC phones offered to Bluegrass Cellular's customers have tested successfully for use on Bluegrass Cellular's system.

(2) Laboratory used: Bluegrass Cellular does not conduct the laboratory testing of handset devices for compliance with the ANSI C63.19 standard. Bluegrass Cellular 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 Bluegrass Cellular have tested successfully for M3 and T3 compliance or better.

(4) Identification of compliant phone models and ratings according to ANSI C63.19: The HAC phone models offered by Bluegrass Cellular are as follows:

<u>MODEL</u>	<u>FCC ID</u>	<u>RATING</u>
Kyocera K323	OVFKWC-K24B	M4 T4
Kyocera K612	OVFKWC-KX21-2X0	M3
LG 210	BEJ VX3400	M4 T4
LG 245	BEJ VX5300	M4
LG 355 / LG 357	BEJ LX350	M3 T3
Motorola V323i	IHDT56FA1	M4 T4
Motorola K1M	IHDT56GH1	M4 T4
Motorola L7c	IHDT56GQ1	M4 T4
Motorola V265	IHDT56ET1	M3
Motorola V3C/V3M	IHDT56FT1	M4 T4
Motorola W315	IHDT56GE1	M3
Motorola W385	IHDT56HC1	M4 T4
Nokia 2865	QMNRM-193	M3
Samsung A870	A3LSCHA870	M3 M4 T4

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

(6) Outreach efforts: Compliant Phones are publicly identified for consumers and audiologists. Bluegrass Cellular’s Compliant Phones are listed on Bluegrass Cellular’s web site, and the information is available to consumer groups. Bluegrass Cellular trains its retail salespeople regarding which of the digital wireless phones offered are Compliant Phones. Written materials, pamphlets and other promotional literature are provided at the point of sale, addressing the needs of individuals with hearing disabilities. Bluegrass Cellular conducts a consumer education program aimed at reaching hearing aid and cochlear implant users. Consumers are given a 30-day trial period within which to try out the digital wireless phone to determine whether they will work properly with their hearing aids. Flexible exchange and return policies apply to consumers seeking to obtain a Compliant Phone. Bluegrass Cellular instructs its sales force to make this policy known to consumers, and to assure that the flexible policy is administered to HAC phone users. Additionally, Bluegrass Cellular conducts outreach activities toward audiologists and hearing aid dispensers who are in a position to inform hearing aid users in advance concerning the immunity of their hearing aids and the degree of likelihood that they will be able to use particular digital wireless phones and services. Current technical and anecdotal information is made available to the public regarding the hearing aid compatibility of Bluegrass Cellular’s Compliant Phones, often in the form of handouts from Vendors that are distributed at retail centers and in all communications with the hearing disabilities community.

(7) Retail availability of compliant phones: The Compliant Phones offered by Bluegrass Cellular are presently available in Bluegrass Cellular's retail outlets.

(8) Incorporation of hearing aid compatibility features into newer models of digital wireless phones: Bluegrass Cellular is in contact with its Vendors with regard to their incorporation of HAC features into future CDMA phones. Bluegrass Cellular is following its Vendors' efforts to provide additional new handsets that will be hearing aid-compatible. Bluegrass Cellular 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: Bluegrass Cellular is aware that its Vendors are undertaking to comply with FCC requirements to provide Compliant Phones. Bluegrass Cellular is ready and willing to offer new or 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: Bluegrass Cellular's core assortment presently includes fourteen models of cellular CDMA handsets. Of that number fourteen are rated at least M3 and nine are rated at least T3.

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

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