

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of the Commission's Rules	)	WT Docket No. 07-250
Governing Hearing Aid Compatible Mobile	)	
Handsets	)	
	)	
	)	
Section 68.4(a) of the Commission's Rules	)	WT Docket No. 01-309
Governing Hearing Aid Compatible	)	
Telephones	)	
	)	
	)	
Petition of American National Standards	)	
Institute of Accredited Standards Committee	)	
C63 (EMC) ANSI ASC C63 <sup>TM</sup>	)	

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**REPLY COMMENTS OF VERIZON WIRELESS**

Cellco Partnership d/b/a Verizon Wireless ("Verizon Wireless") submits these reply comments in response to the comments filed in the above-captioned proceedings. As of November 2007 Verizon Wireless offered 38 out of 48 total handsets that meet the M-rating established by the Federal Communications Commission ("FCC" or "Commission"), 19 of which also satisfy the T-rating - thus far exceeding the requirements of the existing Hearing Aid Compatibility Rules<sup>1</sup> ("HAC") as well as those proposed in the Joint Consensus Plan "Plan". Verizon Wireless actively participated in the development of the Plan and joins the vast majority of commenters supporting the Commission's expeditious adoption of the Plan in its entirety

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<sup>1</sup> 47 C.F.R. § 20.19

without modification or additions<sup>2</sup> as changes to the proposal could deter future cooperation between carriers, manufacturers, and consumer groups to develop shared solutions to shared public policy problems presented by HAC. As T-Mobile commented, "the sooner service providers and manufacturers are given a clear mandate on how to meet HAC standards, the faster the objectives of the Joint Consensus Plan signatories, as well as the Commission, can be implemented – that is, to provide better mobile communications services and products to consumers with hearing loss."<sup>3</sup>

### **The Commission Should Work Expeditiously to Adopt the Joint Consensus Plan**

Verizon Wireless urges the Commission to work expeditiously to adopt the Plan in order to ensure that manufacturers and carriers “have regulatory certainty and sufficient time to meet their obligations going forward.”<sup>4</sup> However, the Commission should not adopt other changes that are outside the scope of the Plan including the Commission's tentative conclusion that multi-mode phones should not be counted as compatible in any mode if they operate over air interfaces for which technical standards have not been established.<sup>5</sup>

The Commission should rule that multi-mode phones are HAC compliant if the phones meet HAC standards on all air interfaces for which there are established standards, even if the handset also operates on one or more additional air interfaces that do not have established

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<sup>2</sup> See Supplemental Comments of the Alliance for Telecommunications Industry Solutions on behalf of the ATIS Incubator Solutions Program #4 – Hearing Aid Compatibility, WT Docket No. 06-203 filed June 25, 2007. See also Research in Motion Limited Comments at 3-4; Motorola, Inc. Comments at 3; Nokia, Inc. Comments at 2; T-Mobile USA, Inc. ("T-Mobile") Comments at 2-3; Telecommunications Industry Association Comments at 1; AT&T, Inc. at 1.

<sup>3</sup> See T-Mobile Comments at 1-2.

<sup>4</sup> See Telecommunications Industry Association Comments at 2.

standards.<sup>6</sup> If the Commission were to adopt its tentative conclusion the result would be to reduce the access of consumers with hearing aids to innovative products that embrace the latest technologies - the opposite result desired by the wireless industry and consumer groups alike. Further, there is no evidence in the record that would support a conclusion that such a rule is necessary. There is however, considerable evidence that -when technologically feasible- carriers will produce innovative handsets that meet the needs of all consumers including those with hearing aids. Rather than regulating to address an issue the occurrence of which is highly unlikely and speculative at best, the Commission should adopt the Joint Consensus Plan as submitted.

Respectfully submitted,

Handwritten signature of John T. Scott, III in black ink, underlined.

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and

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<sup>5</sup> *NPRM* at ¶ 84.

<sup>6</sup> *See* T-Mobile Comments at 7.