

April 27, 2009

VIA ELECTRONIC FILING

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

Re: Comments on Starkey Laboratories Inc. Request For A Waiver Of Part 15 For The 902-928 MHz Band, ET Docket No. 09-38, and Petition for Rulemaking To Amend The Minimum Bandwidth Requirements in Section 15.247(a)(2) for the 902-928 MHz band, RM -11523.

Dear Ms. Dortch:

Williams Sound Corporation submits these comments in support of Starkey Laboratories Inc. ("Starkey") Request for Waiver of Part 15 of the Commission's Rules and the associated Petition for Rulemaking to amend the minimum bandwidth requirements in Section 15.247(a)(2) for the 902-928 MHz band.¹

Williams Sound has been an industry leader in hearing assistance technology for more than 33 years. We are one of the pioneering providers of wireless assistive listening devices and naturally promote ourselves and our products as "Williams Sound – Helping People Hear."²

Starkey Laboratories requests that its Assistance Listening Devices ("ALDs") be permitted to operate in the 902-928 MHz band with a narrower 6 dB bandwidth of 100 kilohertz, while maintaining the 8 dBm/3 kHz power spectral density limit specified in FCC Rule Section 15.247(e). Current FCC Rule Section 15.247(a)(2) permits operation of systems using digital modulation techniques within the band with a minimum 6 dB bandwidth of 500 kHz.

¹ See FCC Public Notices, DA 09-676, Office of Engineering and Technology Declares The Starkey Laboratories, Inc. Request For A Waiver Of Part 15 For The 902-928 MHz Band To Be A "Permit But Disclose" Proceeding For Ex Parte Purposes And Requests Comments, ET Docket No. 09-38 (Mar. 26, 2009), and DA 09-674, Office of Engineering and Technology Seeks Comment On Petition For Rulemaking By Starkey Laboratories, Inc. To Amend The Minimum Bandwidth Requirements In Section 15.247(A)(2) For The 902-928 MHz Band, RM-11523 (Mar. 26, 2009).

² Additional information on Williams Sound products and services is available at www.williamssound.com.

Starkey Laboratories states that waiver of the rule and eventual rule change would make for better and more efficient use of bandwidth without causing harmful interference to other users. In fact, Starkey explains that its proposed rule change would reduce interference by confining transmissions to a narrower bandwidth. The change would allow Starkey's ALDs to send digital audio information to persons wearing hearing aids for the purpose of improving the communications capabilities of such devices and enhancing their audio experience in public settings. Williams Sound agrees that the proposed rule change has public interest benefits by offering a means for implementing digital ALD transmissions.

Should the Commission grant the instant waiver, it should timely grant similar waivers to other companies, including Williams Sound, to permit development of devices that make use of the rule waiver to assist the hearing impaired. In sum, the FCC should grant the Starkey Request for Waiver and issue a Notice of Proposed Rulemaking to revise Rule Section 15.249 as proposed.

Thank you for the opportunity to comment on this matter.

Sincerely,



Paul Ingebrigtsen
President & CEO
Williams Sound Corp.

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