

**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	)	

**REPLY COMMENTS OF RCA – THE COMPETITIVE CARRIERS ASSOCIATION**

RCA – The Competitive Carriers Association (“RCA”)<sup>1</sup> submits these reply comments in response to the Second Further Notice of Proposed Rulemaking issued by the Wireless Telecommunications Bureau and Office of Engineering and Technology regarding codification of the most current hearing aid compatibility technical standard.<sup>2</sup> RCA applauds the FCC for advancing the FCC’s hearing aid compatibility standard consistent with changes in technology; however, RCA recommends the FCC adopt a 24-month transition period for compliance to allow small and mid-sized wireless carriers to incorporate the new standard into their product development cycles, which are much longer compared to the larger carriers.

RCA supports the proposal to incorporate the latest technical standard, American National Standards Institute (ANSI) standard C63.19-2011, into the Commission’s rules. The proposal appropriately updates the Commission’s rules to reflect advances in technology. The

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<sup>1</sup> RCA is the principal association representing competitive wireless telecommunications providers across the United States. RCA represents the interests of more than 100 members, including many rural and regional wireless carriers.

<sup>2</sup> *See Amendment of the Commission’s Rules Governing Hearing Aid-Compatible Mobile Handsets*, Second Further Notice of Proposed Rulemaking, 266 FCC Rcd 14991 (WTB/OET 2011).

proposal also serves the public interest by extending hearing aid compatibility testing to new and innovative wireless devices and air interfaces.

RCA also agrees with Sprint, CTIA – The Wireless Association, and the Telecommunications Industry Association, however, that the Commission should adopt a 24-month transition period for compliance to enable manufacturers and service providers to incorporate the new standard into their product development cycles.<sup>3</sup> A reasonable transition period is especially important for small and mid-sized wireless carriers, such as many of RCA's members. Small and mid-sized carriers face a number of obstacles to introducing new devices due to device exclusivity agreements between manufacturers and the largest wireless carriers for many of the most desirable new devices. Small and mid-sized carriers also face challenges acquiring new devices because of the lack of interoperability of devices across spectrum bands, such as the Lower 700 MHz band, in which many smaller carriers hold licenses. Consequently, many small and mid-sized carriers are constrained in their ability to introduce new devices, and they have longer product development cycles compared to their largest competitors. Smaller carriers therefore have a particular need for a reasonable transition period that accounts for their development cycles.

In addition, the Commission should provide clarity by confirming that manufacturers and service providers are not required to recertify existing handsets under the new ANSI standard if those handsets were certified under the standard that applied at the time of certification. Handsets that were certified under prior standards should continue to be deemed compliant with the Commission's hearing aid compatibility rules. This approach is consistent with the

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<sup>3</sup> See Comments of Sprint Nextel Corporation, WT Docket No. 07-250, at 1-2 (filed Jan. 13, 2012); Comments of CTIA – The Wireless Association, WT Docket No. 07-250, at 8-9 (filed Jan. 13, 2012); Comments of the Telecommunications Industry Association, WT Docket No. 07-250, at 4-5 (filed Jan. 13, 2012).

Commission's transition to the 2007 standard,<sup>4</sup> and it will avoid unnecessary and potentially costly compliance issues for both manufacturers and carriers.

Respectfully submitted,

/s/

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<sup>4</sup> See *Amendment of the Commission's Rules Governing Hearing Aid-Compatible Mobile Handsets: Petition of American National Standards Institute Accredited Standards Committee C63 (EMC) ANSI ASC C63*, First Report and Order, 23 FCC Rcd 3406, 3439 ¶¶ 81, 83 (2008).