

Dear Sir/Madam:

We are a wireless telephone handset manufacturer from China. We have been producing wireless telephones for many years, and we are about to launch a new model in the U.S.

However, we are facing a problem that about Hearing Aid Compatibility.

According to FCC web site

(<http://www.fcc.gov/guides/hearing-aid-compatibility-wireless-telephones>), handset manufacturers offering a small number of hearing aid-compatible handsets can have a "de minimis" exception. But the detailed entry says:

"Beginning September 8, 2012, wireless service providers and handset manufacturers that are not small entities under Small Business Administration standards, and that have been offering handsets over a digital air interface for at least two years, will no longer qualify for the de minimis exception."

Our doubt is about the condition "**offering handsets over a digital air interface for at least two years**". Is it for in US only or for our company's whole history? That determines whether we should integrate HAC capability in our new product.