

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Access to Telecommunications Equipment and) CG Docket No. 13-46
Services by Persons with Disabilities)

To: The Commission

COMMENTS OF THE HEARING INDUSTRIES ASSOCIATION

1. The Hearing Industries Association (“HIA”) hereby submits these Comments in support of the above-captioned Petition for Rulemaking (“Petition”) filed on October 25, 2012, by the Telecommunications Industry Association (“TIA”), Public Notice released July 19, 2013, DA 13-1601. HIA is the trade association of hearing aid manufacturers and represents manufacturers of some 85% of the hearing aids sold in the United States. Its members have a significant stake in this proceeding, because users of their products expect to be able to interact successfully with the telephone instruments that are the subject of the measurement standard discussed by TIA.

2. HIA participated in discussions with TIA regarding an update of the ANSI/TIA-4965 standard and thanks TIA for accepting its input. HIA agrees with TIA’s approach in the Petition, including in general the principle of keeping standards up-to-date and in particular a change from Receive Objective Loudness Ratings (“ROLR”) to the more realistic Conversational Gain method of measuring telephone speech amplification. HIA has urged an update to the method of measuring speech amplification for some time.

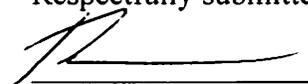
3. In fact, while TIA indicates that its request is limited to wired handsets at this time, a change from ROLR to Conversational Gain would significantly improve HAC evaluation of wireless handsets as well. Currently, hearing aids characterize the level of acoustic input signals in terms of sound pressure level (SPL), with the acoustic output of mobile handsets expressed in terms of the ROLR. By moving to conversational gain, the hearing aid industry could better harmonize hearing aid software to mobile phone acoustic output parameters.

4. And to further improve HAC performance, HIA recommends that the Commission strongly encourage – and if necessary require – mobile handset manufacturers to share relevant technical information with the hearing aid industry through an appropriate exchange mechanism. In addition, the Commission should facilitate development of acoustic standards for mobile handsets as part of HAC compliance. HIA urges the Commission ultimately to adopt an overall HAC acoustic rating that covers the acoustic output level, frequency response, volume control range, and distortion levels of mobile handsets. A logical starting point would be the current required values for acoustic output and volume control for landline phones (47 C.F.R. § 68.317), converted to dB SPL. Information sharing could help create realistic and effective standards. HIA notes that acoustic standards would not only benefit hearing aid users but anyone who uses a cell phone, particularly in noisy environments.

5. Accordingly, HIA urges the Commission to issue a Notice of Proposed Rulemaking at an early date, to bring the benefits of an improved measurement standard to hearing aid wearers who seek a more satisfactory experience using telephone services of all kinds.

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Respectfully submitted,



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