



TELECOMMUNICATIONS
INDUSTRY ASSOCIATION

1320 N. Courthouse Rd., Suite 200
Arlington, VA 22201 USA
www.tiaonline.org

Tel: +1.703.907.7700
Fax: +1.703.907.7727

Via Electronic Filing (<http://apps.fcc.gov/ecfs/>)

January 16, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth St., S.W.
Washington, DC 20554

Re: *WT Docket Nos. 07-250 and 10-254*

Dear Ms. Dortch:

On Tuesday, January 14, 2014, the Telecommunications Industry Association ("TIA")¹ communicated by conference call with the Federal Communications Commission's ("Commission") Wireless Telecommunications Bureau ("WTB") to discuss issues under the above-referenced dockets. Present during this conference call on behalf of TIA were Brian Scarpelli, Mary Brooner, and David Dougall of BlackBerry and Chair of TIA's Accessibility Working Group. Present on behalf of the Commission were Michael Janson, WTB; Jane Jackson, WTB; and Nese Guendelsberger, WTB. We note that TIA's views were solicited by the Commission on a variety of topics under the above-referenced dockets.

During this conversation TIA discussed its members' commitment to providing accessibility for the disabled populations to ICT products and services, including by working with all stakeholders to improve hearing aid compatibility ("HAC") of wireless phones. TIA described the success realized under the current HAC rules, and noted that in many cases manufacturers have exceeded regulatory requirements. TIA also noted that expanding the application of HAC rules to all air interfaces gives rise to serious technical feasibility concerns which include various aspects of testing, a lack of necessary industry testing standardization, as well as a lack of availability of required testing equipment and related software.

¹ TIA is a trade association based in the Washington, DC area which represents the global information and communications technology ("ICT") manufacturer, vendor, and supplier community through policy advocacy and standards development. TIA represents ICT industry consensus accessibility-related positions to Congress, the Federal agencies, civil society, and other stakeholders. Through its Accessibility Working Group, TIA also serves its member companies by providing a forum for addressing existing and emerging accessibility-related issues and events for member companies, as well as a conduit for constructive dialogues with the disability community. See <https://www.tiaonline.org/policy/accessibility>.

TIA also discussed concerns with proposals for the applicability of HAC regulations to 100% of devices. TIA noted its opposition to such a blanket proposal that would ignore not only physics-based limitations, but that manufacturers have worked for over a decade in good faith to improve HAC, as well as that the existing application of HAC regulations has resulted in a global gold standard in the area of improved access to mobile phones for those with hearing disabilities.

Lastly, TIA noted that the HAC standard was designed to be a system standard, covering not only the manufacturers of wireless devices typically held to the ear such as wireless handsets, but also covering the design and manufacture of hearing aids. It is the combination of the wireless device HAC rating and the HAC rating of the user's hearing aid that represents the actual user experience. While the FCC has placed regulatory obligations on wireless device manufacturers, there have yet to be any obligations to test and publish test ratings, as called for in the HAC standard, on manufacturers of hearing aids. TIA urged the Commission to be mindful of the regulatory balance needed to fully implement the HAC standard and to seek means to ensure that all stakeholders engage and commit to meeting the HAC standardization efforts and requirements for improvements to HAC for the benefit of consumers with hearing impairments.

Pursuant to the Commission's rules,² this letter is being electronically filed via ECFS and a copy of this submission is being provided electronically to the meeting attendees.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: /s/ Brian Scarpelli

Brian Scarpelli

Senior Manager, Government Affairs

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

1320 North Courthouse Road

Suite 200

Arlington, VA 22201

703.907.7700

January 16, 2014

cc: Michael Janson, WTB
Jane Jackson, WTB
Nese Guendelsberger, WTB

² 47 C.F.R. § 1.1206.