

**Before the  
Federal Communications Commission  
Washington, DC**

In the Matter of	)	
	)	
Section 68.4(a) of the Commission's Rules	)	WT Docket No. 06-203
Governing Hearing Aid Compatible Telephones	)	
	)	
	)	

**MOTION  
FOR EXTENSION OF TIME**

Pursuant to Section 1.46 of the Federal Communications Commission's ("FCC" or "Commission") Rules, the Alliance for Telecommunications Industry Solutions ("ATIS"), on behalf of its Incubator Solutions Program #4- Hearing Aid Compatibility ("AISP.4-HAC") and the parties signing this Motion, respectfully files this motion requesting extensions of time for the filing of comments and reply comments in response to the FCC's November 8, 2006, *Public Notice*, DA 06-2285. The *Public Notice*, which seeks input on topics to be addressed in the FCC's hearing aid compatibility ("HAC") report, establishes a comment submission deadline of December 15, 2006, and a reply comment submission deadline of January 5, 2007. ATIS respectfully requests that the comment submission date be extended until January 12, 2007, and that the reply comment submission date be extended to January 31, 2007.

## **I. ATIS' INTEREST**

ATIS is a technical planning and standards development organization accredited by the American National Standards Institute (“ANSI”) and committed to rapidly developing and promoting technical and operational standards for communications and related information technologies worldwide using a pragmatic, flexible and open approach. Industry professionals from more than 350 communications companies actively participate in ATIS’ open industry committees and other forums. The ATIS membership spans all segments of the industry, including local exchange carriers, inter-exchange carriers, wireless equipment manufacturers, competitive local exchange carriers, data local exchange carriers, wireless providers, providers of commercial mobile radio services, broadband providers, software developers and internet service providers.

AISP.4-HAC is focused on the technical issues addressing interoperability and compatibility of wireless devices with hearing aids, including the evaluation and test methodology of the measurement standard as referenced in the ANSI ASC C63.19 Standard. AISP.4-HAC is composed of technical experts from the wireless industry representing wireless manufacturers and service providers, as well as technical experts representing the hearing aid industry. Representatives from consumer advocacy and disability groups also actively participate in open AISP.4-HAC meetings.

The AISP.4-HAC has the following membership as of December 5, 2006:

### **MEMBERS**

Alltel	Dobson Cellular Systems, Inc./American
Brookings Municipal Utilities d/b/a	Cellular Corporation
Swiftel Communications	Epic Touch
Carolina West Wireless	Hewlett Packard
Cingular Wireless LLC	Immix Wireless
Corr Wireless Communications, LLC	Key Communications
Cricket Communications	Keystone Wireless

Kyocera Wireless  
Leap Wireless  
LG  
Louisiana Unwired  
Motorola, Inc.  
NEC America, Inc.  
Nokia  
Panasonic  
Qwest Wireless  
Research In Motion, Ltd

Samsung Telecommunications America LP  
Siemens Communication  
Sprint Nextel  
Sony Ericsson Mobile Communications  
(USA) Inc.  
Suncom  
T-Mobile USA  
UTSTARCOM  
Verizon Wireless

### WORKING PARTICIPANTS

Alexander Graham Bell Association for  
the Deaf and Hard of Hearing  
American Academy of Audiology  
American Academy of Dispensing  
Audiology  
American Speech-Language-Hearing  
Association  
ANSI ASC C63™  
APREL Labs

CTIA-The Wireless Association®  
ETS-Lindgren  
Gallaudet University – Technology  
Access Program and RERC  
Georgia Tech- RERC on Wireless  
Hearing Industries Association  
Hearing Loss Association of America  
PC Test Engineering Laboratory, Inc.  
Schmid & Partner Engineering AG

## II. NEED FOR RELIEF

ATIS understands that the *Report and Order* in WT Docket No. 01-39 (“*R&O*”) provides that the FCC staff will deliver a report to Commission shortly after November 17, 2006, or three years after the effective date of the *R&O*.<sup>1</sup> This report will assess the impact of the HAC rules on the goal of achieving greater compatibility between hearing aids and wireless devices, and examine new technologies that could provide more efficient accessibility for hearing aid users and the effect of the HAC rules on cochlear implant and middle ear implant users.<sup>2</sup> The purpose of this report is to provide the FCC with information that can be used to initiate a proceeding to investigate potential changes to its HAC rules. ATIS’ request for an extension of time to file comments and reply comments is necessary to allow the industry to better assist the FCC with its assessment of the rules.

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<sup>1</sup> In the Matter of Section 68.4(a) of the Commission’s Rules Governing Hearing Aid Compatible Telephones, *Report and Order*, WT Docket No. 01-309 (rel. Aug. 14, 2003) at ¶74.

<sup>2</sup> *Id.*

ATIS is requesting an extension of time so that the industry can complete and verify its analysis of test data that could be useful in the FCC's review of the existing HAC rules. Providing additional time will allow the industry to provide the Commission with a full and complete record of these test results.

The ATIS Incubator is also working to better identify the challenges associated with the February 18, 2008, deadline by which 50% of all wireless device models offered by manufacturers and carriers must be rated M3 or higher<sup>3</sup>. As part of its assessment, the industry is in discussion with consumers to see if implementation alternatives can be found that would benefit both industry and consumers.

This extension of time was discussed at the full Incubator meeting on November 30, and was unanimously agreed to by the wireless carriers, wireless device manufacturers and consumer advocates present. Many of these organizations have agreed to officially sign on to this motion.

### **III. CONCLUSION**

ATIS understands that the FCC does not routinely grant extensions of filing deadlines.

However, the FCC has often recognized that extending the deadlines for comments and reply comments is warranted when the extension would ensure that the FCC receives full and informed responses to the issues and that affected parties have a meaningful opportunity to develop a complete record for the FCC's consideration. ATIS believes that, for the foregoing reasons, an extension of the comment and reply comment deadlines, until January 12 and January 31, 2007, respectively, is warranted.

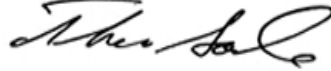
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<sup>3</sup> 47 CFR §§ 22.19(c)(1) (ii), (c)(2)(ii).

**WHEREFORE, THE PREMISES CONSIDERED**, ATIS, on behalf of AISP.4-HAC and the parties signing this Motion, respectfully submits this Motion for Extension of Time for inclusion on the record in this proceeding.

Respectfully submitted by:

**ATIS on behalf of AISP.4-HAC**



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December 5, 2006