



March 27, 2006

Julius P. Knapp
Deputy Chief
Office of Engineering and Technology
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte* in WT Docket No. 01-309
Section 68.4(a) of the Commission's Rules Governing Hearing Aid Compatible
Telephones

Dear Mr. Knapp:

The Alliance for Telecommunications Industry Solutions ("ATIS"), on behalf of its Incubator Solutions Program #4 ("AISP.4-HAC") members, requests that the FCC immediately adopt version 3.12 of the C63.19 Technical Measurement Standard¹ for measuring and rating wireless devices' compatibility with hearing aids. This request is made in accordance with the agreement reached at the C63.19 Sub-Committee 8 Working Group meeting held February 28-March 1, 2006.

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 and consumer advocacy such as Hearing Loss Association of America (HLAA) and Gallaudet University.²

¹ *American National Standards for Methods of Measurement between Wireless Communications Devices and Hearing Aids* ANSI C63.19-2001 ("C63.19 Standard").

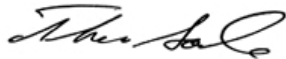
² The AISP.4-HAC has the following voting and non-voting membership as of March 24, 2006: Alexander Graham Bell Association for the Deaf and Hard of Hearing (AG Bell), American Academy of Audiology (AAA), American Academy of Dispensing Audiology (AADA), American Speech-Language-Hearing Association (ASHA), APREL Labs, CTIA-The Wireless Association®, ETS-Lindgren, Gallaudet University – Technology Access Program and Rehabilitation Engineering Research Center, Hearing Loss Association of America (HLAA), PC Test Engineering Laboratory, Inc., Schmid & Partner Engineering AG (SPEAG), American Cellular Systems, Alltel, Brookings Municipal Utilities d/b/a Swiftel Communications, Carolina West Wireless, Cingular Wireless LLC, Corr Wireless Communications, LLC, Cricket Communications/Leap Wireless, Dobson Cellular Systems, Inc., EpicPCS, Key Communications/West Virginia Wireless, Keystone/Immix Wireless, Kyocera Wireless, LG Electronics, Inc., Louisiana Unwired, Motorola, Inc., NEC America, Inc., Nextel Partners Inc., Nokia, Panasonic, Qwest Wireless, Research In Motion Ltd, Samsung Telecommunications America LP, Siemens

In the FCC's August 2003 *Report and Order (R&O)* adopting the C63.19 Standard, the FCC recognized that this standard remained a work in progress subject to further revisions, and acknowledged that its rules would need to accommodate revisions made to the Standard.³ On April 25, 2005, the FCC further acknowledged the evolving nature of the standard by releasing a *Public Notice* to clarify that applicants for certification may rely on either the 2001 or 2005 version of the C63.19 Standard.⁴

AISP.4-HAC respectfully requests that the FCC immediately adopt version 3.12 of the C63.19 Standard (rd 3.12) and clarify that applicants for certification may rely on this version of the standard in determining compliance with the FCC's HAC mandates and upcoming deadlines.⁵ This request reflects the agreement of the AISP.4-HAC members, C63 Standards Committee, and FCC at the February 28 C63 SC8-WG3 meeting.

If you have any questions regarding this matter, please contact the undersigned.

Sincerely,



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Communications, Inc., Sprint Nextel Corporation, Sony Ericsson Mobile Communications (USA), Inc., Suncom, T-Mobile USA, UTSTARCOM and Verizon Wireless.

³ *R&O*, ¶63.

⁴ *Public Notice*, WT Docket No. 01-309, DA 05-1134 (rel. April 25, 2005).

⁵ 47 CFR .§20.19(d).