



1200 G Street, NW
Suite 500
Washington, DC 20005

P: +1 202-628-6380
W: www.atis.org

January 29, 2021

VIA ELECTRONIC FILING
Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Year 4 Discretionary Update – Joint Consensus Proposal for
Hearing Aid Compatibility Task Force
Ex Parte, WT Docket No. 15-285

Dear Ms. Dortch,

This update is being filed on behalf of the multi-stakeholder Hearing Aid Compatibility Task Force (“HAC Task Force”), which is administered by The Alliance for Telecommunication Industry Solutions (“ATIS”) and was chartered to recommend to the Federal Communications Commission (“FCC” or “Commission”) whether 100 percent hearing aid compatibility (“HAC”) is achievable for wireless handsets in a Final Report to the Commission due no later than December 31, 2022. Three prior discretionary updates were filed on behalf of Competitive Carriers Association (“CCA”), CTIA, the Hearing Loss Association of America (“HLAA”), the National Association of the Deaf (“NAD”), Telecommunications for the Deaf and Hard of Hearing, Inc. (“TDI”), and the Telecommunications Industry Association (“TIA,” together, “Joint Consensus Proposal Signatories”).

This update provides a summary on the progress of the HAC Task Force since its inaugural meeting on February 11, 2020. The Task Force also established working groups to conduct various research projects, and a summary of those activities is also provided.

Membership

The Hearing Aid Compatibility Task Force is a partnership of stakeholders representing both industry and consumer advocacy, and participation has grown considerably since its inception. At the time of this writing, the member organizations represented by the HAC Task Force are Apple Inc., AT&T, the Competitive Carriers Association (“CCA”), Consumer Technology Association (“CTA”), CTIA, Gallaudet University, Google, Hearing Industries Association (“HIA”), Hearing Loss Association of America (“HLAA”), Mobile & Wireless Forum, National Association of the Deaf (“NAD”), PCTEST Engineering Laboratory, Samsung Electronics America, Starkey, T-Mobile USA, Telecommunications for the Deaf and Hard of Hearing Inc. (“TDI”), the Telecommunications Industry Association (“TIA”), Union Telephone Company, US Cellular, and Verizon. All of the following representatives participate in the Task Force. In addition, the Task Force agreed to form Working Group 1 (“WG1”), Working Group 2 (“WG2”), and Working Group 3 (“WG3”) as described in more detail below. Task Force participants that volunteered to participate in working groups are indicated below:

- Zainab Alkebsi, NAD [WG2]
- Colin Andrews, TIA
- Shellie Blakeney, T-Mobile USA, Task Force Vice Chair [WG1, WG2]

- Kevin Butler, T-Mobile USA
- Kate Carr, HIA [WG1, WG2]
- Justin Chao, PCTEST Engineering Laboratory [WG1, WG2, WG3]
- Steven Coston, PCTEST Engineering Laboratory [WG1]
- James Craig, Apple Inc., Task Force Chair [WG1, WG2, WG3]
- John Crockett, AT&T [WG1, WG3]
- Ian Dillner, Verizon [WG1, WG2]
- Chuck Eger, Mobile & Wireless Forum
- Ian Fisch, Apple Inc. [WG1]
- Matthew Gerst, CTIA
- Kara Graves, CTIA
- Lise Hamlin, HLAA, Task Force Vice Chair [WG1, WG2]
- Cody Hogan, T-Mobile USA [WG1]
- Eric Kaika, TDI [WG1]
- Maria Kirby, Apple Inc.
- Linda Kozma-Spytek, DHH Tech RERC at Gallaudet University [WG1, WG2, WG3]
- Robert Kubik, Samsung Electronics America [WG1, WG2, WG3]
- Sarah Leggin, CTIA [WG1, WG2, WG3]
- Steve Liu, PCTEST Engineering Laboratory [WG1, WG2]
- Ian Lewis, Google [WG1, WG3]
- Milan Lukic, Google [WG1, WG3]
- Vonda Long-Dillard, AT&T
- Alexi Maltas, CCA
- Alexandra Mays, CCA [WG3]
- Susan Mazrui, AT&T
- Dominik Mente, Google
- Rachel Nemeth, CTA [WG1, WG2]
- Jonathon Norton, AT&T
- Ross Peard, Apple Inc.
- Mike Roden, AT&T
- Howard Rosenblum, NAD
- Jeff Solum, Starkey [WG1]
- Claude Stout, TDI
- Bill Tortoriello, US Cellular
- Linda Vandeloop, AT&T
- Steven Willingham, T-Mobile USA [WG1, WG2, WG3]
- Dave Wilson, CTA [WG2]
- Brian Woody, Union Telephone Company [WG1]
- Eric Woody, Union Telephone Company
- Sharlene Yuan, Google
- Helen Zhao, Google

Full HAC Task Force Meetings:

- **February 11, 2020, 01:00pm to 05:00pm EST**

During the first official Task Force meeting, the participants discussed leadership structure, adopted operating procedures, established working groups, developed a work plan to complete initial research projects, and discussed other projects that the HAC Task Force should undertake throughout 2020.

The following participants were elected to the HAC Task Force leadership positions:

- HAC Task Force Chair (Wireless Original Equipment Manufacturer (“OEM”)): James Craig, Apple Inc.
- HAC Task Force Co-Vice Chair (Wireless Service Provider): Shellie Blakeney, T-Mobile USA
- HAC Task Force Co-Vice Chair (Consumer): Lise Hamlin, HLAA

Participants agreed to form three working groups: WG1 to study available and evolving HAC technologies; WG2 to study consumer usage of HAC technologies and alternatives; and WG3 to analyze the potential impact of the new ANSI C-63.19 HAC standard on the work of the Task Force. All working groups were open to all Task Force participants. Task Force participants joined and contributed to working groups on a voluntary basis, and working group activities were conducted on a consensus basis. Participants also agreed that the deliverable of WG1 would be a working document providing an overview of those HAC technologies that would inform the subsequent work of WG2. WG1 launched in March 2020. Participants also agreed to form an Executive Committee consisting of Task Force leadership and representatives from each participant type to provide direction and respond to inquiries, where necessary. The Executive Committee has not yet been established, and will be discussed at the February 10, 2021 HAC Task Force meeting.

- **May 19, 2020, 01:00pm to 03:00pm EDT**

During the second official Task Force meeting, Task Force and WG1 Chair James Craig (Apple, Inc.) presented the data gathered on available and evolving HAC-rated technologies, compiled by WG1 for purposes of internal discussion. Task Force members Linda Kozma-Spytek (DHH Tech RERC at Gallaudet University), Ian Fisch (Apple Inc.) and Jeff Solum (Starkey) also presented to the meeting participants on various forms of hearing aid connectivity, and Sarah Leggin (CTIA) updated the group on FCC activities. The Task Force agreed to launch WG2 in May 2020, with WG1 meetings concluding in June 2020.

- **September 30, 2020, 01:00pm to 03:00pm EDT**

WG2 Co-Chairs Lise Hamlin (HLAA) and Rachel Nemeth (CTA) presented a summary of WG2 activities to date, including an overview of subject matter expert presentations. Rachel Wolkowitz (Wilkinson Barker Knauer) updated the group on the FCC’s pending NPRM proposing to incorporate the 2019 ANSI C63.19 standard into its HAC rules. The Task Force launched WG3 in September 2020 to analyze the potential impact of the new standard on the work of the Task Force.

Next Upcoming HAC Task Force Meeting:

February 10, 2021, 01:00pm to 03:00pm EST

HAC Task Force Working Group Meetings:

The Task Force's various working groups met more frequently than the full Task Force membership. A summary of the progress made by each working group follows.

HAC Task Force, Working Group 1: Available and Alternative HAC Technologies

Mission: Research what currently available and emerging technologies enable those with hearing loss to connect to their devices. The focus of the WG is (1) hearing devices, (2) means of coupling, and (3) wireless handsets.

Chaired by James Craig (Apple Inc.), WG1 gathered compatibility data on mobile phone handsets hearing devices available to U.S. consumers. Primary contributors compiled a spreadsheet from a variety of public sources, and each manufacturer's representative was tasked with validation of their company's data. James Craig (Apple) and Rob Kubik (Samsung) presented the preliminary WG1 spreadsheet and other deliverables during the full Task Force meeting on May 19, 2020 and presented its revised deliverables at the WG2 meeting on June 30, 2020.

HAC Task Force Working Group 2: Consumer Usage of HAC Technologies and Alternatives

Mission: Survey and understand what features are being utilized by consumers and how they are being utilized.

Chaired by Lise Hamlin (HLAA) and Rachel Nemeth (CTA), the mission of WG2 is gathering data to determine whether the existing definition of hearing aid compatibility is the most effective means for ensuring access to wireless handsets for consumers who use hearing aids, while also encouraging technological innovation and advancement.

WG2 will conduct two surveys to understand the behavior and experiences of: (1) consumers who use hearing devices; and (2) hearing health care professionals. WG2 agreed that a third-party research firm should be engaged to conduct the two surveys. To inform the development of the surveys, WG2 has heard from experts including hearing health care professionals, market researchers, and survey usability experts. The hearing health care professionals provided background on how consumers use their hearing aids with wireless devices as well as how audiologists typically fit consumers with hearing aids and how they inform their clients about connectivity to wireless devices. WG2 also reviewed prior surveys that examined hearing aid use with wireless handsets.

WG2 developed a request for proposals ("RFP") describing the research tasks agreed upon by WG2, which was approved by the full Task Force. The RFP has been circulated to market research companies. WG2 expects to engage a company and complete the surveys by Q2 2021.

HAC Task Force Working Group 3: Analysis of Changes to ANSI C63.19 Hearing Aid Compatibility Standards

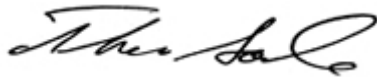
Mission: Examine potential impact of changes to ANSI C63.19-2019 (2019 update to the 2011 version) and related FCC rulemaking on the work of the HAC TF (i.e., achievability of 100% compliance).

Chaired by Robert Kubik (Samsung) and Justin Chao (PCTEST), WG3 has begun gathering data to understand the changes between the 2011 and 2019 versions of the ANSI C63.19 hearing aid compatibility standards, and new equipment required to test the 2019 version of the standard. WG3 has heard from experts in the ANSI C63.19 standards committee and from test equipment manufacturers to better understand the new requirements. In 2021, the group will collect information on the current status of mobile devices and hearing aids to pass the C63.19-2019 standard, as well as evaluate the upcoming FCC decision regarding adoption of the C63.19-2019 standard into its HAC rules. WG3 expects to complete its work in Q2 2021.

ATIS and the HAC Task Force are pleased to submit this voluntary fourth update to the Commission. We look forward to continuing to work collaboratively on the HAC Task Force effort and to engaging in productive discussions regarding the balanced goal of hearing aid compatibility for all wireless handsets while encouraging innovation to the benefit of consumers who rely on hearing devices.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this letter is being electronically submitted into the record of this proceeding. If there are any questions about this Year 4 Discretionary Update, please do not hesitate to contact the undersigned.

Sincerely,



Thomas Goode
ATIS General Counsel

cc:

James Craig (Apple), Chair, ATIS HAC Task Force
Lise Hamlin (HLAA), Vice Chair, ATIS HAC Task Force
Shellie Blakeney (T-Mobile), Vice Chair, ATIS HAC Task Force
Garnet Hanly, FCC WTB
Ethan Lucarelli, FCC WTB
Diane Burstein, FCC CGB
Suzy Rosen Singleton, FCC CGB
Eliot Greenwald, FCC CGB
David Strickland, FCC