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May 17, 2006

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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

Dear Ms. Dortch:

On May 15, 2006, representatives from the Alliance for Telecommunications Industry Solutions ("ATIS") Incubator Solutions Program 4 dealing with Hearing Aid Compatibility issues ("AISP.4-HAC" or "HAC Incubator") met with representatives from the Federal Communications Commission's ("FCC") Office of Engineering and Technology ("OET") and Wireless Telecommunications Bureau ("WTB). At the meeting, the ATIS HAC Incubator representatives asked the FCC to adopt Revision Draft 3.12 of the C63.19 Standard for hearing aid compatibility compliance authorizations. This discussion was consistent with the written presentation attached to this letter.

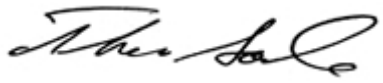
The individuals representing the AISP.4-HAC at this meeting were: Mary Jones, Consultant, T-Mobile; Steve Coston, Technical Manager, Regulatory Project Office, Sony Ericsson Mobile Communications; Scott Kelley, Senior Staff Engineer, Disability Access, Product Safety & Compliance, Motorola Personal Communications Sector; David Dzumba, Senior Manager, Nokia; James Turner, Technical Coordinator, ATIS; and Thomas Goode, Associate General Counsel, ATIS.

In attendance, representing OET were: Julius Knapp, Deputy Chief; Rashmi Doshi, Chief of the Laboratory Division; Bill Hurst, Chief of the Technical Research Branch; Patrick Forster, Senior Engineer, Policy and Rules Division; and Martin Perrine, Electronic Engineer, Laboratory Division. The WTB representatives at the meeting were: Blaise Scinto, Senior Counsel; and Michael Wilhelm, Division Chief, Public Safety & Critical Infrastructure Division.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, one copy of this letter is being filed electronically for inclusion in the public record of the above-referenced proceeding.

If there are any questions regarding this matter, please do not hesitate to contact the undersigned.

Sincerely,



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Attachment

ATIS Incubator Solutions Program
#4- HAC
Working Group 4

Technical Challenges Surrounding HAC

May 15, 2006

Agenda

- C63.19 Standard and Status
- Industry Concerns with Proposed Amendment
- Challenges for HAC Compliance
- Ambient Noise Issue

C63.19 Standard and Status

- C63.19 rd 3.12 unanimously approved
  - No ANSI public comments received.
- Industry requests FCC to:
  - Adopt rd 3.12 for compliance authorizations in order for manufacturers to meet the September deadline.
  - Eliminate confusion by clarifying that only rd 3.12 should be used to determine HAC.

C63.19 Standard and Status (cont'd)

- All parties (wireless carriers, wireless manufacturers, HLAA, HIA, etc.) agree that:
  - The FCC should endorse rd. 3.12.
  - The proposed amendment to C63.19-2006 would follow typical standards processes.
  - Any FCC endorsement of the amendment must account for industry development and deployment cycle times.

C63.19 Amendment Details

a) Change the magnetic measurement orientations from the axial and two radial to two measurements in one plane (reference Section 6.3, and 7.3.3, Annex A-3).

b) Determine the signal strength(s) for the new T-Coil measurement orientations (Section 7.3.1).

c) Revise the signal-to-noise range in Table 7.7.

d) Decouple the overall RF measurement on the mobile from limiting the rating of the T-Coil measurement.

e) Change the RF measurement position from bottom of probe to the center of element and change to test distance from 1 cm to 1.5 cm (reference Section 4.4, and Annex A-2).

f) Incorporate the test validation coil (TVC) tool into the Standard as an illustrative reference (similar to the dipole in the RF) in T-Coil Section 6 and the Annex (for development).

C63.19 Amendment Decisions

a) Change the magnetic measurement orientations from the axial and two radial to two measurements in one plane (reference Section 6.3, and 7.3.3, Annex A-3).

- Rejected; the current measurement orientations have been retained.

b) Determine the signal strength(s) for the new T-Coil measurement orientations (Section 7.3.1).

- Adopted, with 18 dB A/m as the required signal level for all orientations.

c) Revise the signal-to-noise range in Table 7.7.

- Adopted Category T3 minimum of 20 dB, with spacing at 10dB.

d) Decouple the overall RF measurement on the mobile from limiting the rating of the T-Coil measurement.

- Adopted, allowing separation of RF (emission) M and T rating **if** the M rating (the lower of M or T) is greater than or equal to M3 such that a phone rated at M3 and T4 would be acceptable; where the T4 rating is for baseband only.

C63.19 Amendment Decisions (cont'd)

e) Change the RF measurement position from bottom of probe to the center of element and change to test distance from 1 cm to 1.5 cm (reference Section 4.4, and Annex A-2).

- Adopted.

f) Incorporate the test validation coil (TVC) tool into the Standard as an illustrative reference (similar to the dipole in the RF) in T-Coil Section 6 and the Annex (for development). The TVC's intended use is as a magnetic source for measurement setup validation, to be specified as an open-sourced device. It is not intended as a substitute for Helmholtz coil calibration of the magnetic sensing probe.

- Adopted.

Industry Concerns Regarding C63.19 Amendment

a) Change the magnetic measurement orientations from Axial and two radial to two measurements in one plane (reference Section 6.3, and 7.3.3, Annex A-3).

- Rejection forces manufacturers to design for the test and not the optimum position for hearing aid wearers.

c) Revise the Signal to Noise range in Table 7.7.

- Industry would need time to incorporate the new Category T3 minimum of 20 dB.

Immediate Challenges for HAC Compliance

- Manufacturers cannot currently submit devices to TCBs for certification under rd 3.12.
  - TCBs cannot certify devices for T-Coil or rd. 3.12 RF.
- Industry is concerned about any *NEW* certification process changes that could impact industry's ability to meet the September deadline.
  - Unplanned changes in 2005 to RF test requirements after TCB training created confusion in the wireless industry.
- How can industry and FCC work together to be ready for the September deadline?

Ambient Noise Issue

- Ambient noise in labs has negative impact on C63.19 T-Coil measurements.
- Consumers experience the same ambient noise in some hearing aids when in T-Coil mode.
- The industry is working on a formula to characterize the ambient noise issue.

Conclusions

- Industry requests that the FCC:
  - Adopt rd 3.12 for HAC compliance authorizations.
  - Commit to FCC processes and resources that will timely certify T-Coil and rd. 3.12 RF compliance.
  - Support efforts to ensure that the proposed amendment follows typical standards processes, taking into account industry development and deployment cycle times.
- Expeditious approval of these requests will facilitate compliance with September deadline.

Comments, Questions?

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