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July 18, 2023

## VIA ELECTRONIC FILING

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

**Re: *Ex Parte Notice – Improvements to Benchmarks and Related Requirements Governing Hearing Aid-Compatible Mobile Handsets, WT Docket No. 15-285; Amendment of the Commission’s Rules Governing Standards for Hearing Aid-Compatible Handsets, WT Docket No. 20-3.***

Dear Ms. Dortch,

On July 14, 2023, representatives from the ATIS Hearing Aid Compatibility Task Force (“HAC Task Force”) spoke with representatives from the Federal Communications Commission’s (“Commission”) Consumer and Governmental Affairs Bureau, Wireless Telecommunications Bureau, and Office of Engineering and Technology via video conference regarding the pending Waiver Request in the above-captioned dockets.<sup>1</sup> A list of meeting attendees is attached to this letter.

During the meeting, the HAC Task Force representatives highlighted the unanimous record support for the Waiver Request and discussed various technical details related to the consensus interim testing standard.<sup>2</sup> The HAC Task Force representatives reiterated their strong commitment to Chairwoman Rosenworcel’s vision of achieving 100% hearing aid compatibility (“HAC”) for wireless handsets. The HAC Task Force representatives urged the Commission to adopt the Report and Recommendation’s (“Report”) proposals to achieving 100% HAC, and explained that grant of the Waiver Request would not cause the Commission to deviate from reaching that goal.

With respect to the Waiver Request, the HAC Task Force representatives explained that the consensus testing methodology provides an interim approach that will enable testing of certain volume control aspects, while the TIA standards group (TIA TR-41) works to revise

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<sup>1</sup> *Wireless Telecommunications Bureau Seeks Comment on ATIS Waiver Request on Behalf of the Covered Entities of the Hearing Aid Compatibility Task Force*, Public Notice, WT Docket No. 20-3, DA 23-250 (WTB rel. Mar. 23, 2023); *see also* Petition of ATIS on Behalf of the Covered Entities of the Hearing Aid Compatibility Task Force for Limited, Interim Waiver, WT Docket Nos. 15-285 & 20-3 (Dec. 16, 2022) (“Waiver Request”).

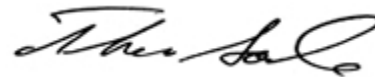
<sup>2</sup> *See* Hearing Aid Compatibility Task Force Final Report and Recommendation, WT Docket No. 15-285 (Dec. 16, 2022).

other aspects of the ANSI/TIA-5050-2018 volume control standard. This interim approach provides consumers access to HAC-rated devices and ensures certain volume control capabilities for users who wear hearing devices and use acoustic coupling to their wireless device for phone calls.<sup>3</sup> Meeting participants discussed a variety of the issues that the HAC Task Force identified with respect to volume control and potential solutions, including the activity of the TIA 5050 group, which is working to revise the volume control testing methodology.

Consistent with the unanimous record support, the HAC Task Force representatives urged the Commission to grant the Waiver Request to allow sufficient time for handset testing—no later than two months in advance of the updated December 5, 2023 compliance deadline, or by Labor Day 2023.

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.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Goode", written in a cursive style.

Thomas Goode  
General Counsel

cc: FCC meeting attendees

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<sup>3</sup> Consumers would also have access to devices tested according to the RF immunity and telecoil coupling aspects of the 2019 ANSI Standard. Waiver Request at 12-13; *see also* Accredited Standards Committee C63<sup>®</sup> - Electromagnetic Compatibility, *American National Standard Methods of Measurement of Compatibility Between Wireless Communications Devices and Hearing Aids*, ANSI C63.19-2019 (“2019 ANSI Standard”).

**Attachment: FCC Meeting Attendees****Commission Staff**

Barbara Esbin, WTB  
Susannah Larson, WTB  
John Lockwood, WTB  
Eli Johnson, WTB  
Saurbh Chhabra, WTB  
Jim Szeliga, OET  
Justin Rison, OET  
Darryl Cooper, CGB

**HAC Task Force Representatives**

Linda Kozma-Spytek, HAC Task Force Executive Committee, DHH Tech RERC at Gallaudet University  
Rob Kubik, HAC Task Force Executive Committee, Samsung  
Shellie Blakeney, HAC Task Force Executive Committee, T-Mobile  
Megan Stull, Apple  
Christiaan Segura, CTIA  
Rachel Wolkowitz, Wilkinson Barker Knauer, LLP, and counsel to CTIA  
Thomas Goode, General Counsel, ATIS  
Michelle Kelley, ATIS