



1200 G Street, NW  
Suite 500  
Washington, DC 20005

P: +1 202-628-6380  
W: [www.atis.org](http://www.atis.org)

September 27, 2023

**VIA ELECTRONIC FILING**

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

**Re: *Ex Parte Letter* – 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,

The ATIS Hearing Aid Compatibility Task Force (“HAC Task Force”) submits this letter regarding the pending Waiver Request and the HAC Task Force Report and Recommendations in the above-captioned dockets.<sup>1</sup>

In the short-term, the Federal Communications Commission (“Commission” or “FCC”) should grant a limited, interim waiver of the current transition to the 2019 ANSI Standard that will allow wireless handsets to meet a modified volume control test that ensures increased amplification for hearing device users until the TIA 5050 standard has been revised and adopted into the FCC’s rules.<sup>2</sup> Timely grant of the Waiver Request will keep the industry on the path to achieving 100% HAC for wireless handsets, ensuring that new HAC-rated phones entering the marketplace will have improved RF immunity, increased telecoil compatibility, objectively tested volume control, and an easier to understand HAC label. The HAC Task Force provided an update of its proposed interim volume control test in its September 12, 2023 submission.<sup>3</sup>

Members of the HAC Task Force reiterate their commitment to working towards the goal that all new handsets will meet HAC requirements, as set forth in the HAC Report. This will

---

<sup>1</sup> See *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”); *Hearing Aid Compatibility Task Force Final Report and Recommendation*, WT Docket No. 15-285 (Dec. 16, 2022) (“HAC Report”).

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

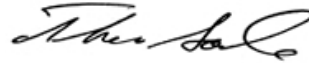
<sup>3</sup> Letter from Thomas Goode, ATIS, to Marlene H. Dortch, FCC, WT Docket Nos. 15-285, 20-3 (filed Sept. 12, 2023).

include an applicable volume control requirement after a transition period, consistent with either the forthcoming waiver order<sup>4</sup> or a newly developed TIA standard adopted by the Commission.

Members of the HAC Task Force also reiterate their commitment to working towards the goal of including Bluetooth connectivity as an alternative to telecoil coupling in a certain percentage of handsets, as described in the HAC Report.<sup>5</sup> As part of that goal, the HAC Task Force will continue to explore the development and inclusion of non-proprietary standards such as Bluetooth Low Energy Audio and Bluetooth Hearing Access Profile in new handsets.

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

---

<sup>4</sup> This commitment assumes that the forthcoming waiver will adopt the HAC Task Force's updated interim volume control test. *See id.*

<sup>5</sup> *See, e.g.*, HAC Report at 24-26 (setting forth a model rule for revised deployment marks of (i) at least 15% of all new handsets to support Bluetooth and that any non-Bluetooth phones to include telecoil compatibility and (ii) at least 85% of handsets to include telecoil compatibility and any non-telecoil handsets to support Bluetooth).