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SUMMARY

TIA members have been integral to the successful implementation of the Commission's hearing aid compatibility ("HAC") policies. Consistent with its recently-announced Innovation Package of policy recommendations, TIA submits that by encouraging collaboration among stakeholders and the utilization of voluntary consensus based standards, the Commission can continue to improve accessibility and encourage innovation, thereby meeting its statutory obligations under Section 710 of the Communications Act and maintaining the enormous success of the Commission's HAC regime.

The feasibility and necessity of any new benchmarks should be reassessed after manufacturers and service providers have had experience in deploying new models and services under the current regime and the revised standard. The most recent changes to the benchmarks adopted in 2008 and 2010 have yet to go fully into effect, and manufacturers will be implementing changes to the ANSI C63.19 standard during that period as well.

Nor should the Commission impose a 100 percent compliance requirement. Such an approach would be detrimental to investment and innovation because manufacturers would likely need to withdraw existing products from the market and delay the introduction products in the U.S. to meet such a rule. For the same reason, the Commission should not impose higher or disparate benchmarks on specific technologies. In any case, such a requirement is unnecessary, as the need to offer compliant products in the U.S. marketplace and market incentives to offer innovative handset products have resulted in the widespread availability of HAC-certified handsets across all technologies. The Commission should also consider at least easing the product refresh rule, depending on industry's marketplace experience under the current requirements.

Issues concerning the ANSI C63.19-2007 standard should be revisited after the 2010 standard is adopted and manufacturers have had the opportunity to test and obtain HAC certification. Concerns relating to the standard are most effectively addressed through the standards development process and should be raised there in the first instance. Moreover, some of the Bureau's questions will necessitate the participation of hearing aid manufacturers in this proceeding and in the ANSI C63.19 ratings system more broadly. The Commission should use this proceeding as an opportunity to directly engage that industry. Finally, the Commission should not presume that achieving HAC compliance for a particular air interface protocol under the current standard is an easy task, as handset designs and technologies will continue to evolve.

The Form 655 filing process for manufacturers could be more efficient if the Form were available for filers to populate all year or during a greater portion of the year. The Commission should also continue to examine methods for integrating the relevant database and filing systems. The Commission's handset packaging and website information disclosure requirements are effective and adequate in making information available to consumers. The Commission should thus assess the sources of information available to consumers after the new clearinghouse has been effect for some time and after manufacturer- and service provider-based information has been even more widely disseminated. Avoiding duplicative requirements is consistent with the Data Innovation Initiative objectives and the recent Presidential memorandum seeking to ease regulatory burdens.

Regarding other hearing technologies, the Bureau should evaluate WG-11's findings and recommendations in collaboration with manufacturers, service providers, hearing aid manufacturers and consumers, and consider whether any recommendations for Commission action are necessary. Manufacturers' and the Commission's experience with volume control features on wireline phones cannot not be applied whole cloth to wireless handsets. Regulations governing or restricting features and device characteristics such as display screens and backlights are unnecessary and potentially counterproductive. Manufacturers require flexibility to account for these features in designing their products, and the Commission should not take action that undermines that flexibility. Issues concerning wireless headsets and earpieces are not HAC issues *per se*, but there is much anecdotal evidence that many consumers already use headsets as accessibility solutions and the Commission should not take any action that impedes the use of and innovation in these technologies.

Finally, answers to questions relating to hearing aid capabilities should come from hearing aid manufacturers are particularly relevant to future efforts to improve the information available to hearing aid users. TIA thus urges the Commission to coordinate with the Food and Drug Administration ("FDA") and reach out to hearing aid manufacturers for that purpose.

Finally, collaboration among affected stakeholders is among the most effective and efficient means of addressing accessibility concerns that arise regarding technology and marketplace developments. TIA remains committed to working with ANSI and directly with the Commission and the disability community to address these issues. It is particularly important that the Commission reach out to the FDA and hearing aid manufacturers in this effort. The Accessibility Innovation Forum and the upcoming clearinghouse could potentially serve that purpose.

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)
)
2010 Review of Hearing Aid Compatibility) WT Docket No. 10-254
Requirements)
)

To: Chief, Wireless Telecommunications Bureau

**COMMENTS OF THE
TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

The Telecommunications Industry Association (“TIA”) hereby submits comments on the Wireless Telecommunications Bureau’s (“Bureau”) Public Notice in the above-captioned proceeding.¹ TIA is the leading trade association for the information and communications technology (“ICT”) industry, representing companies that manufacture or supply the products and services used in global communications across all technology platforms. TIA represents its members on the full range of public policy issues affecting the ICT industry and forges consensus on industry standards. Among their numerous lines of business, TIA member companies design, produce, and deploy a wide variety of devices with the goal of making technology accessible to all Americans. TIA members have been integral to the successful implementation of the Commission’s hearing aid compatibility (“HAC”) policies, and TIA looks forward to participating in this latest Commission initiative.

INTRODUCTION

TIA recognizes the importance of accessible communications technologies for our nation’s economic growth, and to the social and economic well-being of individuals with

¹ *Comment Sought on 2010 Review of Hearing Aid Compatibility Regulations*, Public Notice, WT Docket No. 07-254, DA 10-2388 (WTB released Dec. 28, 2010) (“PN”).

disabilities. TIA's recently-announced Innovation Package of policy recommendations thus appropriately incorporates accessibility as a key component.² Consistent with its Innovation Package, TIA submits that by encouraging collaboration among stakeholders and the utilization of voluntary consensus based standards, the Commission can continue to improve accessibility and encourage innovation, thereby meeting its statutory obligations under Section 710 of the Communications Act. To that end, TIA strongly supports the Commission's 2010 *Policy Statement*, and supported and helped craft the Accessibility Act's amendments that modernized Section 710. These policies are consistent with and helped instruct TIA's own policy approach.³

The Commission's HAC rules and policies to date have proven enormously successful precisely because they have largely followed the approach Congress mandated in Section 710 of the Communications Act and which TIA has incorporated into its Innovation Plan. Section 710 of the Act has long required that the Commission address technical feasibility and the marketability of wireless handsets when applying HAC requirements to such devices.⁴ The Commission, in turn, has applied the statute in a manner that generally enabled manufacturers to incorporate HAC capabilities into their product lines while not unduly hindering innovation. Congress acknowledged the success of this approach when it affirmed the Commission's

² See TIA Press Release, *TIA's Innovation Package Offers Blueprint for President Obama's Call for Infrastructure Investment*, Jan. 24, 2011, available at http://www.tiaonline.org/news_events/press_room/press_releases/2011/PR-124_TIA_s_Innovation_Package_Offers_Blueprint_for_Pres.cfm. TIA's Innovation Package provides that "By encouraging collaboration among stakeholders and the usage of voluntary consensus based standards the U.S. Government can increase the accessibility of technology by those with disabilities, encourage innovation and in doing so open up new employment opportunities for this vulnerable community."

³ See *In the Matter of Amendment of the Commission's Rules Governing Hearing Aid-Compatible Mobile Handsets*, Policy Statement and Second Report and Order and Further Notice of Proposed Rulemaking, WT Docket No. 07-250, 25 FCC Rcd. 11,167, 11,174 ¶ 18 (2010) ("*Report and Order*"), *recon. pending*; *Twenty-First Century Communications and Video Accessibility Act of 2010*, Pub.L. 111-260 (as amended by Pub.L. 111-265), § 102, 124 Stat. 2751, 2753-54 (2010) (the "Accessibility Act").

⁴ See 47 U.S.C. § 610(b)(1) (2009).

wireless HAC rules in the Accessibility Act.⁵ Section 710's amended statutory framework requires that the Commission maintain this approach and apply it more broadly.⁶ The Bureau's recommendations to the Commission must accordingly follow this approach as well.

DISCUSSION

I. THE COMMISSION SHOULD RETAIN THE EXISTING BENCHMARKS AND FOCUS ON IMPLEMENTATION OF THE ANSI C63.19-2010 STANDARD

A. The Commission Can Best Preserve Accessibility and Handset Innovation By Maintaining the Existing Benchmarks

The *PN* asks a number of questions concerning the success of the existing benchmarks and potential changes to the benchmarks in the future.⁷ As the chart in the *PN* demonstrates, manufacturers' compliance with the existing benchmarks has proven successful, with HAC-compliant models widely available across all technologies.⁸ Moreover, the Commission just modified its benchmarks in its 2008 *First Report and Order*, the latest of which goes into effect only later in 2011.⁹ In addition, last year's *Second Report and Order* expanded the scope of the rules to include manufacturers' direct-to-customers' sales offerings, and the Commission's decision there to phase out the *de minimis* exemption for manufacturers will be implemented over the course of the next few years as new standards, air interface protocols and handset

⁵ See Accessibility Act § 102(d) (codified at 47 U.S.C. § 610(h)). New section 710(h) of the Communications Act specifically provides that "Nothing in the [Accessibility Act] shall be construed to modify the Commission's regulations set forth in section 20.19 of [the rules], as in effect on the date of enactment of such Act."

⁶ The Accessibility Act requires that the Commission apply these principles to interconnected and non-interconnected VoIP services. See *id.* § 102(c) (codified at 47 U.S.C. § 610(e)).

⁷ See *PN* at 5-6 (§§ 1-2).

⁸ See *id.* at 5.

⁹ See *In the Matter of Amendment of the Commission's Rules Governing Hearing Aid-Compatible Mobile Handsets*, First Report and Order and Further Notice of Proposed Rulemaking, WT Docket No. 07-250, 23 FCC Rcd. 3,406, 3,418-22 ¶¶ 34-41 (2008) ("*First Report and Order*"), codified at 47 C.F.R. §§ 20.19(c)(1), (d)(1).

portfolios are introduced.¹⁰ Finally, during this same period the Commission (through the Bureau and Office of Engineering and Technology) will likely be implementing the updated ANSI C63.19 standard after ANSI formally submits the final version to the Commission for consideration.¹¹

The feasibility and necessity of any new benchmarks should be reassessed after manufacturers and service providers alike have had experience in deploying new models and services under the current regime and the revised standard. In this regard, the Commission might consider alternatives to its current application of the benchmarks – which requires that benchmarks be met during any given month – in order to afford manufacturers and service providers more flexibility to address the vagaries of the marketplace.¹² Provided that a manufacturer’s or service provider’s aggregate handset offerings over time are sufficient to ensure that a variety of HAC-certified models are widely available in the marketplace, the fact that a particular company’s offerings may dip below a given level for a short period of time does not necessarily undermine the Commission’s accessibility goals.

¹⁰ See *Second Report and Order*, 25 FCC Rcd. at 11,185-86 ¶ 50 (codified at 47 C.F.R. §§ 20.19(c)(1)(ii)(C), (e)).

¹¹ Incorporation of a new standard into the rules that applies to additional spectrum bands or air interface technologies is subject to notice and comment rulemaking and may become effective for manufacturers not earlier than one year after release of an order adopting the standard. See 47 C.F.R. § 20.19(k).

¹² Both carriers and manufacturers face a wide array of marketplace vagaries that can affect month-to-month compliance. Unexpected parts shortages or changes that require production to cease can disrupt carefully laid plans to maintain compliance, or require equipment modifications necessitating a Class II permissive change before shipments from the factory can resume. Transportation delays beyond the control of a manufacturer or carrier can also disrupt the ability of either to offer a particular HAC-certified model. Even unanticipated market developments, such as a last minute handset order that extends the end-of-life date for a noncompliant handset, can adversely affect a manufacturer’s compliance with the HAC rules without actually diminishing the number of HAC compliant handsets offered. These factors also can effectively prevent the introduction of new handset model while a manufacturer adjusts its product roadmap to ensure that the correct percentage is maintained.

The *PN* also seeks comment on the merits of a requirement that 100 percent of models be HAC-compliant.¹³ Such an approach would be detrimental to investment and innovation because manufacturers would likely need to withdraw existing products from the market and delay the introduction products to meet such a rule. The Commission has previously acknowledged how such a requirement could impede innovation and the introduction of new services and devices, and its rationale is every bit as relevant today.

[T]he Commission is concerned that requiring 100 percent compliance at this time could have the unintended effect of stifling innovation. The HAC Act specifically directs the Commission to structure its rules in a manner that “[does] not discourage or impair the development of improved technology.” The diversity of wireless phones and features not only represent a robust market of ideas becoming reality, they represent a market that is characterized by rapid change in capabilities of the devices. For instance, picture phones and movie phones are becoming available at prices that may make them attractive to consumers. Interference levels of these devices are not known by the Commission at this time. However, as a policy matter and consistent with the spirit of the HAC Act, we do not want to deter the manufacturers of these products from bringing them to market.¹⁴

Moreover, handsets with new and innovative features, including those that could benefit individuals with disabilities other than hearing loss, could be delayed or might not be introduced in the U.S. at all. Such an outcome could frustrate Congress’s Accessibility Act objective of promoting accessibility more broadly,¹⁵ and would undermine Commission and other Federal government policies of promoting innovation in wireless technology.¹⁶

¹³ See *PN* at 5 (§ 1(b)).

¹⁴ See *Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones*, WT Docket No. 01-309, 18 FCC Rcd. 16,753, 16,784 ¶ 80 (2003) (citations omitted).

¹⁵ See 47 U.S.C. §§ 153(17), 617(a)(1) (defining “disability” broadly for Accessibility Act purposes by reference to the Americans with Disabilities Act, and applying accessibility obligations to manufacturers).

¹⁶ See *White House Press Release, President Obama Details Plan to Win the Future through Expanded Wireless Access*, Feb. 10, 2011, available at <http://www.whitehouse.gov/the-press-office/2011/02/10/president-obama-details-plan-win-future-through-expanded-wireless-access> (announcing goal of “extend[ing] access from the almost 95% of (continued on next page)

The *PN* also asks whether different products and technologies should be subject to different benchmarks.¹⁷ As a general rule, Commission regulations should be technology neutral, but more fundamentally, such a requirement is unnecessary. The need to offer compliant products in the U.S. marketplace already compels manufacturers to incorporate HAC considerations into product design early on in the process.¹⁸ In any case, market incentives to offer innovative handset products have resulted in the widespread availability of HAC-certified handsets across all technologies. Subjecting new technologies to higher benchmarks will not improve those incentives, but merely make it more difficult to introduce new products to the marketplace. Handset engineering and design, and the methods of incorporating HAC capability into a particular model, are necessarily evolving processes given the rapid pace of technological change. A solution that worked for an earlier model may not achieve HAC compliance for a different model, or even “Version 2.0” of the same model. In addition, many products must be designed with global, international deployment in mind, and U.S. HAC regulations are only one of many technical considerations. For the reasons described above, if benchmarks are too high, including technology-specific benchmarks, then these new technologies, many of which have enormous potential to improve communications for individuals with other disabilities, may be delayed or simply not offered in the U.S.

Americans who have 3G wireless services today to at least 98% of all Americans gaining access to state-of-the-art 4G high-speed wireless services within five years.”); *Prepared Remarks of Chairman Julius Genachowski, Federal Communications Commission*, 2011 International Consumer Electronics Show, Las Vegas, NV (Jan. 7, 2011) (noting that “[o]ther nations are not standing still” and “[s]ome project Asia to have more 4G devices than the U.S. by 2014.”).

¹⁷ See *PN* at 5 (§ 1(c)). The *PN* also seeks comment on application of the benchmarks to CDMA technology. See *PN* at 6 (§ 2(b)).

¹⁸ See *PN* at 13 (§ 1.a) (inquiring in the “Innovation, Investment, and Competition” section whether “our rules create appropriate incentives to consider [HAC] early in the product development cycle.”).

The *PN* also seeks comment on potential changes to the product refresh rule.¹⁹ Industry agreed to the refresh rule as part of the 2007 consensus agreement, and its obligations have only been in effect since 2009.²⁰ Nevertheless, by its nature the rule imposes a particularly acute burden on manufacturers with smaller technology portfolios, so TIA urges the Commission to consider providing greater flexibility on the timing of introduction of new models. As industry obtains greater experience with the existing benchmarks, implements the phase-out of the *de minimis* rule, and endeavors to meet consumer demand for new devices in the near term, the Commission might well find that the wireless marketplace can accommodate a more flexible approach to or elimination of the refresh rule.

B. The Commission Should Reassess Technology-Specific Issues and Concerns After Implementation of ANSI C63.19-2010.

The *PN* asks a number of questions relating to compliance with the ANSI C63.19 standard, and the 2007 version in particular.²¹ ANSI will be submitting a new 2010 version of the standard to the Commission in the near future, however, and the issues raised in the *PN* should be revisited after that standard is adopted and manufacturers have had the opportunity to test and obtain HAC certification under the new standard. Moreover, the standard is continually reviewed and updated over time through an open, consensus-driven process, and the Commission may well pass on the adoption of post-2010 versions of ANSI C63.19 as its updated in the future. Consistent with Congress's statutory scheme, moreover, concerns relating to the standard are

¹⁹ See *PN* at 6 (§§ 2(a)-(b)).

²⁰ See *First Report and Order*, 23 FCC Rcd. at 3,425 ¶¶ 48-49 (codified at 47 C.F.R. § 20.19(c)(1)(ii)).

²¹ See *PN* at 7-8 (§§ 4(a)-(b)).

most effectively addressed through the standards development process and should be raised there in the first instance.²²

Nevertheless, some of the issues raised in this section will necessitate the participation of hearing aid manufacturers in this proceeding and in the ANSI C63.19 ratings system more broadly. The Commission should use this proceeding as an opportunity to directly engage that industry.²³ Moreover, and independent of the benchmarks, the Commission should not presume that achieving HAC compliance for a particular air interface protocol under the current standard is an easy task, as handset designs and technologies will continue to evolve. Even where a high rating is feasible for a legacy technology, these will increasingly be offered in conjunction on multimode devices with other air interface protocols, such as WiMax, WiFi, and LTE. Such handsets will be subject to the 2010 version of the ANSI C63.19 standard once implemented and effective, and may face their own technology-specific challenges.

II. THE COMMISSION SHOULD CONTINUE TO RELY ON EXISTING REPORTING AND CUSTOMER DISCLOSURE RULES

The *PN* asks several questions concerning potential changes to the FCC Form 655.²⁴ From a logistical standpoint, the Form 655 filing process for manufacturers could be more efficient if the Form were available for filers to populate all year or during a greater portion of the year. TIA's manufacturer members take this filing obligation seriously, and subject their reports to significant management and legal review. The filing window, however, often does not afford enough time for such scrutiny. The global nature of the handset manufacturing business

²² See 47 U.S.C. § 610(c) (allowing manufacturers to rely on public technical standards for compliance purposes).

²³ See *PN* at 13 (§ 5) (inquiring about hearing aid device functions and potential coordination with the Food and Drug Administration).

²⁴ See *PN* at 8-9 (§ 1).

complicates matters further, as overseas employees or management may sometimes be sometimes unavailable to assist in meeting the current July deadline during crucial periods. A more flexible approach would also make it easier for companies to file corrections that are discovered later.

The Commission should also continue to examine methods for integrating the relevant database and filing systems, which today still require duplicative information (*e.g.*, as between the OET equipment authorization database and Form 655). The Commission should also ensure that its implementation of the information clearinghouse and the recordkeeping requirements of the Accessibility Act do not result in duplicative information collections.²⁵ These objectives are consistent with the Commission’s broader “Data Innovation Initiative” and Chairman Genachowski’s decision to follow the recent Presidential memorandum to Federal agencies targeting burdensome regulations.²⁶

Finally, the Commission’s handset packaging and website information disclosure requirements are effective and adequate in making information available to consumers.²⁷ TIA understands that HAC-related complaints to the Consumer and Governmental Affairs Bureau have largely disappeared, and a review of manufacturer and service provider websites and product materials reflects that HAC-related information for handsets is readily available to any consumer looking for it. In that regard as well, TIA understands that manufacturers have already been able to incorporate the multi-mode label language required in the *Second Report and Order*

²⁵ See 47 U.S.C. §§ 618(a)(5), (d).

²⁶ See Memorandum of January 18, 2011, *Regulatory Compliance*, 76 Fed. Reg. 3825 (Jan. 21, 2011).

²⁷ See *PN* at 9-10 (§§ 2-3).

in advance of the March 2011 deadline.²⁸ In light of these facts, the Commission should assess the sources of information available to consumers *after* the new clearinghouse has been effect for some time and *after* manufacturer- and service provider-based information has been even more widely disseminated. Finally, as with the Form 655, the Commission should ensure that its new clearinghouse and other information collections under the Accessibility Act do not impose duplicative burdens on manufacturers.

III. THE COMMISSION SHOULD NOT IMPOSE PARTICULAR HEARING TECHNOLOGIES OR TECHNICAL RESTRICTIONS ON HANDSET MANUFACTURERS

The *PN* asks a number of questions concerning the potential for acoustic coupling and volume control to improve the usability of wireless handsets for hearing aid users.²⁹ As noted in the *PN*, ATIS Working Group 11 (“WG-11”) has been evaluating such issues. Rather than present any recommendations to the Commission at this point, though, the Bureau should evaluate WG-11’s findings and recommendations in collaboration with manufacturers, service providers, hearing aid manufacturers and consumers, and consider whether any recommendations for Commission action are necessary. TIA also cautions that manufacturers’ and the Commission’s experience with volume control features on wireline phones cannot not be applied whole cloth to wireless handsets.

The *PN* also seeks comment on whether to adopt measures governing handset functions such as display screens and backlights.³⁰ Commission regulation governing or restricting these features and device characteristics is unnecessary and potentially counterproductive. Standards

²⁸ See 47 C.F.R. § 20.19(f)(2).

²⁹ See *PN* at 11-12 (§§ 1(a)-(d)).

³⁰ See *id.* at 12 (§ 2).

and testing procedures already account for the functions of those handset components, which often must be configured in a given manner for their principal commercial purpose. Moreover, there has been considerable improvement in the quality of and features available through handset display screens, and Commission regulation risks jeopardizing future innovation in this area. Finally, there are many other design and component features that affect hearing aid usability. Manufacturers require flexibility to account for these features in designing their products, and the Commission should not take action that undermines that flexibility.

The *PN* also seeks comment on issues concerning wireless headsets and earpieces and the extent to which they are usable with certain hearing aids.³¹ These are not HAC issues *per se*, as “compatibility,” by the terms of Section 710(b)(1) of the Act, means usability via “internal means” to the handset.³² Nevertheless, there is much anecdotal evidence that many consumers already use headsets as accessibility solutions – a factor potentially helpful to manufacturers’ compliance with Sections 255 and 716 of the Act – and the Commission should not take any action that impedes the use of and innovation in these technologies. In that regard as well, TIA notes that headset technologies are accounted for in Part 7 of the ANSI C63.19 standard and, in any event, TIA is unaware of any complaints or interference issues relating to these devices and hearing aids.

Finally, the *PN* seeks comment on a number of critical questions concerning the characteristics of hearing aid devices themselves.³³ Answers to these questions from hearing aid manufacturers are particularly relevant to future efforts to improve the information available to

³¹ *See id.* at 12 (§ 3).

³² *See* 47 U.S.C. § 610(b)(1).

³³ *See PN* at 13 (§ 5).

hearing aid users. Additionally, participation in this proceeding (and in the ANSI C63.19 standard's M/T-rating system generally) by hearing aid manufacturers will be important to further improving the effectiveness of the Commission's HAC regime for hearing aid users. TIA thus urges the Commission to coordinate with the Food and Drug Administration ("FDA"), as suggested in the *PN*, and reach out to hearing aid manufacturers to address these questions.

IV. THE COMMISSION SHOULD FACILITATE ONGOING COLLABORATION AMONG AFFECTED STAKEHOLDERS

The final but perhaps most important questions in the *PN* relate to ongoing stakeholder collaboration.³⁴ TIA's and its members' experience in accessibility-related matters generally, including HAC, reflects that collaboration among affected stakeholders is among the most effective and efficient means of addressing accessibility concerns that arise regarding technology and marketplace developments. TIA remains committed to working with ANSI and directly with the Commission and the disability community to address these issues.

As noted above, it is particularly important that the Commission reach out to the FDA and hearing aid manufacturers in this effort. To date, neither hearing aid manufacturers nor the FDA have comprehensively addressed hearing aid device capabilities or issues in the many venues that have convened in recent years, such as ANSI C63, the former ATIS HAC Incubator, the Access Board, or Commission rulemaking proceedings. The Accessibility Innovation Forum has potential in this regard, as does the upcoming clearinghouse required under the Accessibility Act, but in all events the Commission should proactively reach out to those stakeholders to encourage their future participation in those information sharing venues.

³⁴ *See id.* at 14.

CONCLUSION

As discussed above, the Commission should continue the success of the HAC rules by maintaining and monitoring the wireless industry's implementation of the current handset benchmarks and the ANSI C63.19-2010 standard; by applying the current reporting and public information rules; and working to ensure that handset manufacturers are more meaningfully incorporated into the Commission's HAC regulatory scheme.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: _____

Danielle Coffey
Vice President, Government Affairs

Rebecca Schwartz
Director, Regulatory and Government Affairs

Its Attorneys

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