Before the
Federal Communications Commission
Washington, DC

In the Matter of ) )
Section 68.4(a) of the Commission’s Rules ) WT Docket No. 06-203
Governing Hearing Aid Compatible Telephones )

MOTION FOR EXTENSION OF TIME

Pursuant to Section 1.46 of the Federal Communications Commission’s (“FCC” or “Commission”) Rules, the Alliance for Telecommunications Industry Solutions (“ATIS”), on behalf of its Incubator Solutions Program #4- Hearing Aid Compatibility (“AISP.4-HAC”) and the parties signing this Motion, respectfully files this motion requesting extensions of time for the filing of comments and reply comments in response to the FCC’s November 8, 2006, Public Notice, DA 06-2285. The Public Notice, which seeks input on topics to be addressed in the FCC’s hearing aid compatibility (“HAC”) report, establishes a comment submission deadline of December 15, 2006, and a reply comment submission deadline of January 5, 2007. ATIS respectfully requests that the comment submission date be extended until January 12, 2007, and that the reply comment submission date be extended to January 31, 2007.
I. ATIS’ INTEREST
ATIS is a technical planning and standards development organization accredited by the
American National Standards Institute (“ANSI”) and committed to rapidly developing
and promoting technical and operational standards for communications and related
information technologies worldwide using a pragmatic, flexible and open approach.
Industry professionals from more than 350 communications companies actively
participate in ATIS’ open industry committees and other forums. The ATIS membership
spans all segments of the industry, including local exchange carriers, inter-exchange
carriers, wireless equipment manufacturers, competitive local exchange carriers, data
local exchange carriers, wireless providers, providers of commercial mobile radio
services, broadband providers, software developers and internet service providers.

AISP.4-HAC is focused on the technical issues addressing interoperability and
compatibility of wireless devices with hearing aids, including the evaluation and test
methodology of the measurement standard as referenced in the ANSI ASC C63.19
Standard. AISP.4-HAC is composed of technical experts from the wireless industry
representing wireless manufacturers and service providers, as well as technical experts
representing the hearing aid industry. Representatives from consumer advocacy and
disability groups also actively participate in open AISP.4-HAC meetings.

The AISP.4-HAC has the following membership as of December 5, 2006:

MEMBERS

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<thead>
<tr>
<th>Alltel</th>
<th>Dobson Cellular Systems, Inc./American Cellular Corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brookings Municipal Utilities d/b/a Swiftel Communications</td>
<td>Epic Touch</td>
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<tr>
<td>Carolina West Wireless</td>
<td>Hewlett Packard</td>
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<td>Cingular Wireless LLC</td>
<td>Immix Wireless</td>
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<td>Corr Wireless Communications, LLC</td>
<td>Key Communications</td>
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<tr>
<td>Cricket Communications</td>
<td>Keystone Wireless</td>
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II. NEED FOR RELIEF

ATIS understands that the Report and Order in WT Docket No. 01-39 ("R&O") provides that the FCC staff will deliver a report to Commission shortly after November 17, 2006, or three years after the effective date of the R&O. ¹ This report will assess the impact of the HAC rules on the goal of achieving greater compatibility between hearing aids and wireless devices, and examine new technologies that could provide more efficient accessibility for hearing aid users and the effect of the HAC rules on cochlear implant and middle ear implant users. ² The purpose of this report is to provide the FCC with information that can be used to initiate a proceeding to investigate potential changes to its HAC rules. ATIS’ request for an extension of time to file comments and reply comments is necessary to allow the industry to better assist the FCC with its assessment of the rules.

¹ In the Matter of Section 68.4(a) of the Commission’s Rules Governing Hearing Aid Compatible Telephones, Report and Order, WT Docket No. 01-309 (rel. Aug. 14, 2003) at §74.
² Id.
ATIS is requesting an extension of time so that the industry can complete and verify its analysis of test data that could be useful in the FCC’s review of the existing HAC rules. Providing additional time will allow the industry to provide the Commission with a full and complete record of these test results.

The ATIS Incubator is also working to better identify the challenges associated with the February 18, 2008, deadline by which 50% of all wireless device models offered by manufacturers and carriers must be rated M3 or higher\(^3\). As part of its assessment, the industry is in discussion with consumers to see if implementation alternatives can be found that would benefit both industry and consumers.

This extension of time was discussed at the full Incubator meeting on November 30, and was unanimously agreed to by the wireless carriers, wireless device manufacturers and consumer advocates present. Many of these organizations have agreed to officially sign on to this motion.

**III. CONCLUSION**

ATIS understands that the FCC does not routinely grant extensions of filing deadlines. However, the FCC has often recognized that extending the deadlines for comments and reply comments is warranted when the extension would ensure that the FCC receives full and informed responses to the issues and that affected parties have a meaningful opportunity to develop a complete record for the FCC’s consideration. ATIS believes that, for the foregoing reasons, an extension of the comment and reply comment deadlines, until January 12 and January 31, 2007, respectively, is warranted.

\(^3\) 47 CFR §§ 22.19(c)(1) (ii), (c)(2)(ii).
WHEREFORE, THE PREMISES CONSIDERED, ATIS, on behalf of AISP.4-HAC and the parties signing this Motion, respectfully submits this Motion for Extension of Time for inclusion on the record in this proceeding.

Respectfully submitted by:

ATIS on behalf of AISP.4-HAC

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December 5, 2006