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February 15, 2008

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: WT Docket No. 07-250  
*Ex Parte* Presentation

Dear Ms. Dortch:

On February 13, 2008, representatives from the Alliance for Telecommunications Industry Solutions (ATIS) Incubator Solutions Program 4 – Hearing Aid Compatibility (AISP.4-HAC) and advocates for consumers with hearing loss met with Renee Crittendon, Legal Advisor for Spectrum and International Issues, for Commissioner Jonathan Adelstein. The purpose of the meeting was to reiterate support for the FCC’s expeditious adoption of AISP-4.HAC’s Joint Consensus Plan (JCP), an interconnected set of rule changes that would modify the FCC’s February 2008 hearing aid compatibility requirements.

During the meeting, the issue of multimode/band handsets discussed in the *Notice of Proposed Rulemaking* in the above-referenced proceeding was raised. AISP-4.HAC, consistent with its filings in this proceeding, continues to believe that the FCC should adopt the JCP without modification. To address the multimode/band issue, AISP.4-HAC noted that the group is discussing a possible way forward that would address the concerns of wireless service providers, manufacturers, and representatives of consumers with hearing loss. This way forward is still being developed but it would not preclude devices operating in modes or bands for which there is no HAC standard to be labeled as HAC-compliant if the devices are compliant in all bands/modes for which a HAC standard does exist. Industry and consumers would work together to explore methodologies for conducting early stage development tests (also known as “quick tests”) to evaluate whether there are HAC interference issues in new bands or modes. The goal of these “quick tests” would be to allow users an opportunity in a controlled environment

to test the wireless devices in all modes or bands and provide direct feedback that would identify interference problems experienced by consumers. AISP.4-HAC is also actively working with consumers to create labeling language for handsets that incorporate new technologies or bands for which HAC technical standards have not been established so customers with hearing loss can make informed choices and are aware of the need to test the phones against their own hearing aids/cochlear implants.

In addition to the above, AISP.4-HAC believes it is important that standards development organizations act expeditiously to adopt HAC standards to address potential interference issues when and if they occur with new technologies. Finally, AISP.4-HAC continues its support for the FCC to conduct a further review of the HAC rules, per the Joint Consensus Plan, to determine whether these rules are effectively ensuring the availability of new technologies for consumers with hearing loss.

AISP.4-HAC understands from the consumer representatives that subsequent conversations between the Commission and these representatives have taken place regarding the multimode issue. From those conversations, AISP.4-HAC understands that the Commission believes there may be a need to have separate rules for converged WiFi handsets and other new technologies.

AISP.4-HAC would support: (1) multimode/band WiFi devices being labeled HAC compliant if the devices are compliant in all bands/modes for which a HAC standard exists; and, (2) keeping the record open for multimode/band handsets using technologies/bands other than WiFi to provide the industry and consumer representatives with sufficient time to fully develop a consensus plan.

The individuals representing AISP.4-HAC at this meeting were: Harold Salters, Director, Federal Regulatory Affairs, T-Mobile USA, Inc.; Clint Robinson, Vice President, U.S. Government Relations, Research In Motion, Ltd.; Derek Khlopin, Director, Regulatory and Industry Affairs, Nokia, Inc.; Susan Mazuri, Director, Federal Regulatory, AT&T Services, Inc.; Mary Brooner, Director, Telecommunications and Strategy, Government Relations, Motorola, Inc.; Scott Kelley, Disability Access Manager, Motorola Mobile Devices Business; Jared Carlson, Director, Regulatory and Government Relations, Ericsson, Inc. (on behalf of Sony Ericsson); Scott Freiermuth, Attorney, Wireless Regulatory Affairs, Sprint Nextel; Deirdre Cheek, Attorney, ATIS; and Thomas Goode, General Counsel, ATIS. Also participating in the meeting via phone, as a representative of consumers with hearing loss, was Karen Peltz Strauss, Consultant, RERC on Telecommunications Access.

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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.

Sincerely,

A handwritten signature in cursive script, appearing to read "Deirdre Y. Cheek", written in black ink.

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Deirdre Y. Cheek  
Attorney