**Document Cover Sheet**

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**Abstract**

The FCC has issued the below public notices:

* WTB Seeks Comment on a Petition for Waiver Filed by ATIS - <https://www.fcc.gov/document/wtb-seeks-comment-petition-waiver-filed-atis>
* WTB Seeks Comment on HAC Task Force's Final Report and Recommendation - <https://www.fcc.gov/document/wtb-seeks-comment-hac-task-forces-final-report-and-recommendation>

For discussion:

* TIA TR-41 should develop an outreach program to communicate to the FCC the makeup and work of TIA TR-41, the time line for completion of its work as well as how to keep the FCC informed of the status of TIA TR-41.

# Introduction

On March 23 the FCC issued public notices that they will seek comment on a petition for waiver (Petition) filed by ATIS requesting waiver of section 20.19(b)(1) and (b)(3) of the Commission’s rules for all entities subject to the hearing aid compatibility rules[[1]](#footnote-1), as well as the report recently filed by the Hearing Aid Compatibility Task Force (Task Force) regarding its recommendations for achieving 100% hearing aid compatibility for wireless handsets (Report)[[2]](#footnote-2).

# Petition

The petition for waiver filed by ATIS requesting waiver of section 20.19(b)(1) and (b)(3) of the Commission’s rules for all entities subject to the hearing aid compatibility rules. The Petition seeks to allow wireless handsets to satisfy a reduced volume control testing methodology to be certified as hearing-aid compatible. ATIS proposed that, for the duration of the waiver, the Commission allow a handset to be certified as hearing-aid compatible if it met the below conditions.

1. Meets the following clauses of the 2019 ANSI Standard:
	1. RF Immunity Test (M – “clause 4”) and
	2. T-Coil Compatibility Test (T – “clause 6”)
2. Passes the conversational gain test in the ANSI/TIA Volume Control Standard for all available codecs and air interface combinations at the 2N level ; and
3. Obtains passing results for at least one of the device’s available codecs for the distortion and frequency response requirements in the ANSI/TIA Volume Control Standard.

When ATIS filed the waiver request TIA had not restarted the consideration of TIA-50505 but noted is in the process of “reinitializing” its standards committee to revise the ANSI/TIA Volume Control Standard. ATIS then notes that stakeholders would need a period of time for testing and implementation of the standard before the Commission considers adopting the revised standard into its rules. ATIS requests that the waiver remain in effect until the Commission has had the opportunity to review the revised standard.

A key question that the FCC is about the time frame for the waiver, such questions may best be addressed by regular communication with the FCC by TR41-VCTG. Some of the questions raised include:

* In order to ensure hearing aid compatibility compliance pursuant to the ATIS waiver and because timely hearing aid compatibility compliance is in the public interest, should we consider requiring the waiver’s covered entities to participate in the TIA standards-setting process?
* Should we establish a period of time for testing and implementation of the standard?

# Report

In December 2022, the ATIS Task Force filed its final Report in WT Docket No. 15-285. The Report examines questions that the Commission in its 2016 hearing aid compatibility order asked interested parties to consider. These questions include: (1) whether 100% hearing aid compatibility is achievable; (2) how a 100% deployment benchmark could rely in part or in whole on alternative hearing-aid compatible technologies; (3) whether service providers should be able to legally rely on information in the Accessibility Clearinghouse in connection with meeting applicable benchmarks; and (4) whether the Commission should establish a fixed period of time or shot clock for the resolution of petitions for waiver of the hearing aid compatibility requirements.

The FCC did not provide any questions directed towards the standard process, but we note the report did provide some recommendations for engagement with the FCC. Those include:

* The HAC Task Force supports revising the standard as quickly as possible. Specifically, the HAC Task Force recommends TIA to reopen the TIA 5050 standard for revision regarding: (i) receive distortion and noise performance; (ii) acoustic frequency response; and (iii) consideration of codecs with speech bandwidth exceeding 50-7000 Hz. If TIA cannot come to a resolution of testing of codecs with bandwidth exceeding 50-7000 Hz, the HAC Task Force recommends that the FCC exclude those from compliance testing. OEM participants of the Task Force are committed to working with TIA, which housed the development of the volume control standard that was incorporated in ANSI C63.19-2019, to update the standard. The HAC Task Force participants plan to work collaboratively with Commission staff to help inform their work with TIA and other stakeholders to expediently revise the standard, and TIA plans to provide regular updates on the progress of the revision to the Commission. [[3]](#footnote-3)

# Recommendation for TR-41 VCTG

In order to help the FCC understand and consider the work of TR-41 VCTG we recommend the task force

1. Develop a plan for regular engagement with the FCC to provide them updates on the work of TR-41 VCTG.
2. Consider the development of a timeline of goals and milestones for the work of TR-41 VCTG for communication with the FCC.
1. WTB Seeks Comment on a Petition for Waiver Filed by ATIS - <https://www.fcc.gov/document/wtb-seeks-comment-petition-waiver-filed-atis> [↑](#footnote-ref-1)
2. WTB Seeks Comment on HAC Task Force's Final Report and Recommendation - <https://www.fcc.gov/document/wtb-seeks-comment-hac-task-forces-final-report-and-recommendation> [↑](#footnote-ref-2)
3. ATIS Task for report at p. 21-22. [↑](#footnote-ref-3)