

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of )  
 )  
Amendment of the Commission’s Rules ) **WT Docket No. 20-3**  
Governing Standards for Hearing Aid- )  
Compatible Handsets )

To: The Commission  
(Filed electronically via ECFS)

**COMMENTS OF THE HEARING INDUSTRIES ASSOCIATION**

1. The Hearing Industries Association (“HIA”) hereby submits these Comments in response to the Commission’s *Notice of Proposed Rulemaking* in the above-captioned proceeding, FCC 20-6, released January 30, 2020. HIA is the trade association of manufacturers of hearing aids. It represents manufacturers of more than 90% of hearing aids sold in the United States. HIA’s members strive to design products that are useful and effective for consumers. It is important to them that other electronic products not interfere with the proper operation of hearing aids and that consumers have every possible opportunity to evaluate how other electronic products affect their hearing aids before they commit to purchase those products.

2. HIA supports the proposal to update to the 2019 ANSI C63.19 standard.<sup>1</sup> The updates simplify testing and reporting and will benefit both manufacturers and consumers. However, adoption of the updated standard should not be used as a reason to extend the deadline for 100% hearing aid compatibility.

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<sup>1</sup> Accredited Standards Committee C63<sup>®</sup> – Electromagnetic Compatibility, *American National Standard Methods of Measurement of Compatibility Between Wireless Communications Devices and Hearing Aids*, ANSI C63.19-2019 (2019 ANSI Standard).

3. Hearing aid dispensers almost always allow customers to return a hearing aid product that does not work well for them. While HIA does not ask that all handset vendors be required to adopt the same “return for any reason” policy, equipment compatibility is important and depends on enough variables that the Commission should mandate as much as possible that consumers have an opportunity to evaluate compatibility before they are locked into a purchase. There should be no relaxation of the in-store testing requirement, and that requirement should be applied to as many types of handset vendors as practicable.

4. HIA appreciates the Commission’s ongoing attention to the needs of users of hearing aids and looks forward to the day (though it has not yet arrived) when hearing aid compatibility disappears as a problem requiring regulatory activity.

Respectfully submitted,



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