

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)	
)	
Amendment of the Commission's Rules Governing Standards for Hearing Aid-Compatible Handsets)	WT Docket No. 20-3
)	
Amendment of the Commission's Rules Governing Hearing Aid- Compatible Mobile Handsets)	WT Docket No. 07-250 (terminated)
)	
Comment Sought on 2010 Review of Hearing Aid Compatibility Regulations)	WT Docket No. 10-254 (terminated)
)	

ADDITIONAL COMMENTS BY JANICE SCHACTER LINTZ

Sept 16, 2020

INTRODUCTION:

I am Janice Schacter Lintz, CEO of Hearing Access & Innovations (HAI) (f/k/a Hearing Access Program) and the mother of a 26-year-old daughter who is hard of hearing. I am a former member of the Federal Communications Commission (FCC) 's Consumer Advisory Committee, appointed for two terms under Chairman Martin. I am also the author of "How to Buy a Cellphone when you have a Hearing Loss," published in Volta Voices,¹

¹<https://janiceslintz.files.wordpress.com/2009/02/vv-cellphone-109.pdf>

which was the most frequently downloaded article by Better Hearing Institute. It was the first article that explained to consumers with a hearing loss how to select a suitable cell phone.

I frequently write on topics related to hearing loss and consumer education. See my articles in the Huffington Post.²

DISCUSSION:

I wish to augment my previous comments. It is vital that the FCC require the term “t-coil” instead of “hearing aid compatible” (HAC). As I stated in my earlier comments, it’s unclear what HAC means, even to CTIA, the cell phone and mobile device membership organization. CTIA recommended using the Global Accessibility Reporting Initiative (GARI) as a search tool to determine which cell phones are t-coil compatible.

As we discussed on our call last week, CTIA's AccessWireless.org hosts the Global Accessibility Reporting Initiative (GARI), a [searchable database](#) of accessible wireless devices tailored to specific needs. Here's a [direct link](#) to its Advanced Search for phones where you can select the "Hearing/Speech" features related to a telecoil that you seek and see which devices are appropriate for your daughter's use.

GARI seems fantastic in concept, except that there are three categories for people with hearing loss:

- 1-Connection available for Induction Loop
- 2-Hearing Aid or "HAC" Setting
- 3-Hearing Aid T-coil Coupling

² <https://www.huffpost.com/author/janice-s-lintz>

<input type="checkbox"/>	visual display of volume with warning	Allows users to monitor and protect their hearing.
<input checked="" type="checkbox"/>	Connection available for Induction Loop	Possibility to access and connect to induction loop.
<input type="checkbox"/>	Allows for sign language communication	Does the device screen support at least 20 frames per second? (minimum for quality sign language communication)
<input type="checkbox"/>	Flashlight Notifications	The device can be configured to alert the user to notifications through flashing the light.
<input type="checkbox"/>	Real-time-text capability	The device supports real-time-text (RTT) capability provided that the network it is operating on also supports RTT.
<input checked="" type="checkbox"/>	Hearing Aid or "HAC" Setting	The device has a user setting designed to reduce issues related to interference buzzing for hearing aid users in telecoil mode. Does not guarantee total clarity.
<input type="checkbox"/>	Adjustable Vibrating Alerts	Allows users to select different vibration settings for various notifications.
<input type="checkbox"/>	Supports Closed Captioning for Web Video or Streaming	Device is capable of displaying closed captioning that is included in a video or video stream.
<input type="checkbox"/>	Front Facing Camera	Allows the front facing camera to be used in signing or two-way video conferencing.
<input type="checkbox"/>	Adjustable Maximum Volume Control	Allows you to change the default volume control limit.
<input type="checkbox"/>	Mono Audio	The device allows for both channels of audio to be routed to one single earpiece.
<input type="checkbox"/>	Two-way Video Communications - using wireless LAN networks	Allows you to make video calls in which you can see the other person and they can see you using your wireless LAN network.
<input type="checkbox"/>	Two-way Video Communications - using mobile networks	Allows you to make video calls in which you can see the other person and they can see you using your mobile network.
<input type="checkbox"/>	Visual Alerts - Electronic Message	When a text, e-mail or IM comes in, it displays a visual alert to indicate it has been received.
<input type="checkbox"/>	Text phone/TTY compatibility	This product is compatible with the Textphone/TTY for the deaf.
<input type="checkbox"/>	Call Logs	Lists all the calls you have dialled, received or missed.
<input type="checkbox"/>	Ringer Volume Adjustable	You can adjust the ringing volume to make it louder or quieter.
<input type="checkbox"/>	Key Feedback - Displayed	When you press the number keys the number is displayed on the screen so you can check that it is correct before dialling.
<input checked="" type="checkbox"/>	Hearing Aid T-coil Coupling	The device is able to connect with a sufficiently immune hearing aid in "Telecoil mode" without significant interference buzzing noise. Does not guarantee total clarity.
<input type="checkbox"/>	Video Conferencing	Whether Two-way Video Conferencing is supported

CTIA was unable to clarify the differences between the categories. I was unsure whether the first option meant that there was an output jack, and I had no idea what the difference was between the second and third option. CTIA referred me to GARI, which hasn't responded to requests for clarification. (Ex A)

If CTIA has no idea which of their member phones are T-coil compatible and GARI has no idea what their terms mean, how is a consumer supposed to demystify this complex language?

Consumers need certainty when they seek to purchase a cell phone that works with their hearing aid. T-coil compatibility is the only solution that makes every phone compatible with a hearing aid/cochlear implant, doesn't burn through pricey batteries, and always connects.

CONCLUSION

I reiterate my urging to the FCC to require a t-coil compatible standard for cell phones and not an unclear "HAC" one.

Respectfully submitted,

Janice S. Lintz, CEO Hearing Access & Innovations, Inc, Brooklyn, NY

Exhibit A



Begin forwarded message:

From: Janice S Lintz <email omitted>
Subject: Re: T-coil Compatibility *9th Request*
Date: September 15, 2020 at 10:32:33 AM EDT
To: accessibility@mwfai.org
Cc: "Janice S. Lintz" <emailOmitted>

On Sep 14, 2020, at 10:05 AM, Janice S Lintz wrote:

On Sep 12, 2020, at 9:21 AM, Janice S Lintz > wrote:

On Sep 9, 2020, at 12:03 PM, Janice S Lintz < wrote:

On Sep 7, 2020, at 11:09 AM, Janice S Lintz <> wrote:

On Sep 5, 2020, at 2:47 PM, Janice S Lintz <> wrote:

On Sep 4, 2020, at 11:08 AM, Janice S Lintz <> wrote:

On Aug 28, 2020, at 9:39 AM, Janice S Lintz <> wrote:

Hi Michael-

Any updates?

Best,

Janice

On Aug 26, 2020, at 4:50 PM, Janice S Lintz <> wrote:

Hi Michael-

The GARI site is fantastic! Why are there three different t-coil options in the advanced search for people with hearing loss?

Thanking you in advance,

Janice

Janice S. Lintz
2020 WBENC WeTHRIVE Program in Partnership with IBM

2018 Bill and Melinda Goalkeepers Foundations Partnership with TPG Recipient
2016 Aspen Institute Spotlight Health Scholar
2016 Nominated United State of Women Changemaker
2008 [People Magazine Hero](#)
Founder and CEO
Hearing Access & Innovations Inc.
C: 917-975-5642
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