



TELECOMMUNICATIONS
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By Electronic Delivery via <https://apps.fcc.gov/oetcf/kdb/index.cfm>

August 16, 2012

Attn: Dr. Rashmi Doshi
Chief, Laboratory Division
Office of Engineering and Technology
Federal Communications Commission
7435 Oakland Mills Rd.
Columbia, MD 21046

Re: Comments of the Telecommunications Industry Association on Draft Knowledge Database Publication Attachment 285076 D02 T-Coil testing for CMRS IP v01 (Guidance for Performing T-Coil tests for Air Interfaces Supporting Voice over IP (e.g. LTE and Wi-Fi) to support CMRS based Telephone Services)

Dear Dr. Doshi:

The Telecommunications Industry Association¹ ("TIA") hereby submits input to the Federal Communications Commission's ("FCC") Office of Engineering and Technology on draft Laboratory Division ("OET Labs") Knowledge Database ("KDB") Attachment 285076 D02 T-Coil testing for CMRS IP v01 (Guidance for Performing T-Coil tests for Air Interfaces Supporting Voice over IP (e.g. LTE and Wi-Fi) to support CMRS based Telephone Services) ("KDB HAC Guidance Attachment"). We appreciate the OET

¹ TIA is a Washington, DC-based trade association and standard developer that represents the global information and communications technology (ICT) industry through standards development, advocacy, tradeshow, business opportunities, market intelligence and world-wide environmental regulatory analysis. For over eighty years, TIA has enhanced the business environments for broadband, mobile wireless, information technology, networks, cable, satellite, and unified communications. TIA's approximately 500 member companies' products and services empower communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment, and entertainment. TIA is accredited by the American National Standards Institute (ANSI). TIA's Technical Regulatory Policy Committee ("TRPC") serves as a common manufacturer partner with the FCC towards the goal of streamlining and clarifying the mechanisms of the FCC equipment certification processes and procedures.



Labs issuance of this draft guidance in its efforts to provide assistance and clarity in HAC compliance for manufacturers, and we support OET Labs issuing final guidance as quickly as possible.

Our specific input is as follows:

Location of Issue/Input	Issue, Proposed Change, and Rationale
<p>Equipment Authorization for devices using C63.19-2011 standard – 4.0 [pg. 4]</p>	<p>The draft states that “At the present time the Commission recognizes that instrumentation necessary to perform the above tests may not be readily available. <i>For the near term the applicants can continue to exclude tests for VoLTE or VoIP over Wi-Fi for CMRS air interfaces with an attestation or declaration in the test report stating that instrumentation for testing VoLTE was not available for T-Coil testing at the time testing was done and when they expect to have operational test instrumentation.</i> In addition, appropriate declarations must be included in the User’s manual” [emphasis added].</p> <p>TIA does not believe that providing such an attestation regarding the availability of testing equipment should be required of manufacturers in their reports to the Commission. The test equipment manufacturers alone, not the equipment manufacturers seeking compliance with Commission rules, have the ability to reasonably predict when operational testing instrumentation is available. Equipment manufacturers seeking compliance with Commission rules, on the other hand, cannot have reliable knowledge of this information and have no means to verify its accuracy when relaying it from the test equipment manufacturers to the Commission, as would be required to comply with the draft KDB language quoted above.</p> <p>We therefore urge OET Labs to remove the attestation requirement from this KDB before proceeding to finalization.</p>



Location of Issue/Input	Issue, Proposed Change, and Rationale
<p>Equipment Authorization for devices using C63.19-2011 standard – 4.0 [pg. 4]</p>	<p>The draft states that “At the present time the Commission recognizes that instrumentation necessary to perform the above tests may not be readily available. For the near term the applicants can continue to exclude tests for VoLTE or VoIP over Wi-Fi for CMRS air interfaces with an attestation or declaration in the test report stating that instrumentation for testing VoLTE was not available for T-Coil testing at the time testing was done and when they expect to have operational test instrumentation. <i>In addition, appropriate declarations must be included in the User’s manual</i>” [emphasis added].</p> <p>TIA does not believe that providing such an attestation regarding the availability of testing equipment should be included in the user manual because this information does not provide meaningful information to consumers. In 285076 D01 HAC Guidance v03r02, OET Labs include guidance on required disclosure statements as specified in Section 20.19(f),² which we believe provides consumers with adequate information on the hearing aid compatibility of the device they are purchasing. It is unclear what the usefulness of an attestation of when a manufacturer expects to have operational test instrumentation available would be.</p> <p>If the Commission does not remove the attestation requirement altogether, as TIA proposes above, we therefore urge OET Labs to remove “In addition, appropriate declarations must be included in the User’s manual” from this KDB before proceeding to finalization.</p>

² See <https://apps.fcc.gov/kdb/GetAttachment.html?id=4gWSQXmdOMycRIbqevlmQg%3D%3D> at 6.



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We respectfully request that OET Labs consider the above comments in its finalization of its KDB HAC Guidance Attachment, and complete and issue final guidance as quickly as possible.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: /s/ Danielle Coffey

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