

It has been estimated that less than 20% people who need hearing aids have purchased them. Even among consumers who have purchased professionally fit hearing aids, complaints are abound and just about everyone knows someone whose hearing aid is in the dresser drawer<sup>1</sup>. Ruth Bentler PhD on national PBS TV surmised as to the reasons: “part vanity; part financial constraints; but mostly, because hearing aids fail to satisfy their expectations for the situations that prompted them to seek help for their hearing loss.”

As an audiologist who has helped thousands of people successfully live with hearing loss, I am all too aware that hearing devices rarely help consumers in reverberant places, such as places of worship, lecture halls and airports or for those whose hearing deficit is complicated by auditory processing challenges. Many people with hearing loss need signal-to-noise improvements that simply cannot be obtained with even the highest-tech hearing aid. This is a physics problem that no hearing aid can be expected to overcome.

Because hearing aids are unable to deliver in the very places where people need and want to hear, the only way that consumers can overcome their limitations, is by using assistive listening technology. The most consumer friendly and *directly* hearing aid compatible assistive technology is the hearing loop. Several studies have shown that hearing loops greatly help hearing aid and cochlear implant users<sup>2</sup>.

To benefit from the increasing number of worldwide installed hearing loops, consumers need access to a vertically oriented **telecoil** with a frequency response that closely matches the microphone sensitivity in the user- (and not just the test-) setting, at equal input levels for the speech frequencies (70 dB SPL vs. 100 mA/m inputs) – something called transparency<sup>3</sup>.

Although the hearing aid industry has been seeking to create a one-system wireless solution for communication between hearing instruments and their surroundings, they have been unable to deliver and experts expect that this development could be out a decade or longer<sup>4</sup>. Until then, to hear in places where all hearing aids/OTC devices are unable to deliver, consumers need access to telecoils to benefit from hearing loops as well as other hearing assistive technology that utilize neckloops *as mandated by the ADA*<sup>5</sup>.

It is therefore the OTC hearing aid manufacturer’s duty to make *every* effort to ensure their devices offer quality, properly positioned telecoils and frequency responses that are as identical as possible to the user’s mic response in the user *and* quality control test mode setting of the instruments, as this will improve MELU (multiple environmental listening utility) and consumer satisfaction<sup>6</sup>.

**I urge the FTC to mandate that OTC hearing aids include telecoils and that they be 1) oriented vertically and 2) transparent – i.e. the gain and frequency response in the telecoil setting closely matches that of the microphone setting when activated by the consumer and the device include a consumer brochure that clearly informs 3) how to activate the telecoil and 4) of the telecoil’s benefits in public facilities equipped with hearing loops and other assistive listening systems.**

Thank you for your attention to this matter.

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<sup>1</sup> [http://journals.lww.com/thehearingjournal/Citation/2000/02000/MarkeTrak\\_V\\_Why\\_my\\_hearing\\_aids\\_are\\_in\\_the.4.aspx](http://journals.lww.com/thehearingjournal/Citation/2000/02000/MarkeTrak_V_Why_my_hearing_aids_are_in_the.4.aspx)

<sup>2</sup> [www.hearingreview.com/2014/09/consumer-perceptions-impact-inductively-looped-venues-utility-hearing-devices/](http://www.hearingreview.com/2014/09/consumer-perceptions-impact-inductively-looped-venues-utility-hearing-devices/)

<sup>3</sup> [http://eo2.commpartners.com/users/audio/downloads/Handouts\\_BW\\_-\\_Induction\\_Induction\\_Whats\\_Your\\_Function.pdf](http://eo2.commpartners.com/users/audio/downloads/Handouts_BW_-_Induction_Induction_Whats_Your_Function.pdf)

<sup>4</sup> [www.hearinghealthmatters.org/hearingnewswatch/2014/hearing-industry-seeks-new-wireless-standard-hearing-aids-t-coil-advocates-say-fast/](http://www.hearinghealthmatters.org/hearingnewswatch/2014/hearing-industry-seeks-new-wireless-standard-hearing-aids-t-coil-advocates-say-fast/)

<sup>5</sup> [www.phonak.com/content/dam/phonak/b2b/FM\\_eLibrary/Increasing\\_hearing\\_aid\\_adoption\\_through\\_multiple\\_environmental\\_listening\\_utility.pdf](http://www.phonak.com/content/dam/phonak/b2b/FM_eLibrary/Increasing_hearing_aid_adoption_through_multiple_environmental_listening_utility.pdf)

<sup>6</sup> [www.ada.gov/reg2010/2010ADASTandards/2010ADASTandards.htm](http://www.ada.gov/reg2010/2010ADASTandards/2010ADASTandards.htm)