



Competitive Carriers Association
Rural • Regional • Nationwide®

March 31, 2017

BY ELECTRONIC FILING

Mr. Donald Clark
Secretary
Federal Trade Commission
Constitution Center
400 7th Street SW
Washington, DC 20024

Dear Mr. Clark:

Competitive Carriers Association (“CCA”)¹ writes in response to the Federal Trade Commission’s (“FTC” or “Commission”) request for comment for discussion at its “Now Hear This: Competition, Innovation, and Consumer Protection Issues in Hearing Health Care” workshop on April 18, 2017.² As part of your preparation for the workshop, CCA is providing a copy of a Consensus Proposal (attached), which was adopted by the Federal Communications Commission (“FCC”) at its August 2016 Open Meeting.³ CCA and its members support the FTC’s goal of ensuring that wireless technologies are accessible to individuals with communications disabilities, while encouraging further investment and innovation for all consumers. As part of the workshop’s discussions on opportunities to advance these goals, CCA encourages the FTC to consider the principles included in the attached Consensus Proposal during the above-mentioned workshop.

By way of background, the Consensus Proposal was jointly executed by CCA, CTIA – The Wireless Association, Telecommunications Industry Association, Hearing Loss Association of America, Telecommunications for the Deaf and Hard of Hearing, and the National Association of the Deaf,⁴ and adopted by the FCC in a 2016 Report and Order.

This Proposal strikes a careful balance between the goal of hearing aid compatibility for all wireless handsets and the need to encourage continued innovation that can benefit all consumers,

¹ CCA is the nation’s leading association for competitive wireless providers and stakeholders across the United States, and its membership includes nearly 100 competitive wireless providers ranging from small, rural carriers serving fewer than 5,000 customers to regional and national providers serving millions of customers. CCA also represents approximately 200 associate members including vendors and suppliers that provide products and services throughout the mobile communications supply chain.

² FTC, “Now Hear This: Competition, Innovation, and Consumer Issues in Hearing Health Care,” *available at* <https://www.ftc.gov/news-events/events-calendar/2017/04/now-hear-competition-innovation-consumer-protection-issues>.

³ *Improvements to Benchmarks and Related Requirements Governing Hearing Aid-Compatible Mobile Handsets*, Report and Order, WT Docket No. 15-285, FCC 16-103, (rel. Aug. 5, 2016) (“Report and Order”).

⁴ *Ex Parte* letter from Rebecca Murphy Thompson, General Counsel, CCA, et. al, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 07-250, 10-254 (filed Nov. 12, 2015) (“Consensus Proposal”).

including those who use hearing aid devices. This balance was developed after thoughtful deliberation and collaboration between industry and consumers. CCA believes the Consensus Proposal can be beneficial to the FTC's examination of competition, innovation, and consumer protection issues raised by hearing health and technology, especially hearing aids.

CCA has worked for many years to ensure that wireless handsets are accessible to and usable by people who use hearing aid devices, and is pleased to continue our ongoing collaboration towards improving communications for all. We applaud the FTC's attention to making telecommunications and advanced communications services even more widely available to consumers.

Please do not hesitate to contact me with any questions or concerns.

Sincerely,

/s/ Rebecca Murphy Thompson

Rebecca Murphy Thompson
EVP & General Counsel
Competitive Carriers Association

cc (via email): Daniel Gilman