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Federal Trade Commission

Title: Notice of Workshop and Requesting Public Comments

Subject Category: Hearing Health and Technology – Workshop, Project No. P171200

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Re: Comments on Hearing Health and Technology

I am a licensed hearing instrument specialist directly serving the hearing impaired for 47 years until my retirement nearly 2 years ago. My father and mother were in the business serving the hard of hearing before me. My father had a hearing loss and wore hearing aids himself.

The practice of appropriately serving the hearing impaired involves so much more than just slapping on a hearing aid and turning up the volume. It begins with appropriate case history, examination, and hearing evaluation to determine if a hearing loss exists and if so, to what degree. If anything would indicate the possibility of medical problems being associated with the hearing condition, medical referral should be made. This would never be accomplished with “over the counter” hearing devices.

Even if there is no medical problem associated with the hearing loss, merely adding volume through some type of amplifier is not a legitimate long term viable way of addressing the hearing problem. When we work with the hearing impaired, we are addressing more than simply hearing. We are addressing the whole aspect of communication. Properly fitted hearing instruments are only one part of improving the communication process for people with a hearing deficiency function more easily in a hearing world. Some have better capabilities in accomplishing this than others involving more than just hearing. Determining this would never be accomplished with “over the counter” hearing devices.

Even if the person can turn up volume, adjust tone, or make other changes to the way the “over the counter” hearing device would sound, if they have had a hearing loss for some time the mind has adjusted to hearing all sounds improperly. What they feel sounds good or normal may not be at all effective for improvement in the communication process and understanding speech. This is what their hearing health practitioner is for. To educate them, work with them to help them transition into the way the world really sounds and help them with actual improvement in the communication process. This cannot be accomplished with “over the counter” hearing devices.

As long as I have been in this field, I feel there has been a lack of education. Education regarding what the problem of hearing loss is really all about. Education of significant others associated with the hearing impaired individual in what their responsibility is and what they can and should do to improve the communication process. Education of society overall regarding hearing deficiency and how to truly help the hearing impaired, not just get angry and short with them. I have watched how the hearing impaired are mistreated my whole carrier. They are thought of as simply not listening or paying attention. They are excluded from activities because

“they can’t hear anyway.” They are shown by others how inconvenient it is when conversation has to be repeated. The disgust on the part of others shows. With no other problem is this so apparent. If a person has mobility problems we hold doors for them, we slow down for them, we help them. If a person has a vision problem we will read things for them, make print larger for them, again... we help them. If a person has limb problems, we are careful to more easily lob the ball to them if we are playing catch. We don’t wind up and pitch the ball to them as fast as we can and then get mad at them when they don’t catch it. Communication is the same thing only we are playing catch with words. With other problems we show them compassion, understanding, and again... we help them. I don’t observe this from others regarding those with a hearing loss. This will not be improved with “over the counter” hearing devices.

In your own description of items of concern on the part of your agency, and I quote “ensure consumers have access to truthful and non-misleading information about hearing health products and services.” Allowing “over the counter” hearing devices will in no way contribute to this concern. It will, in fact, add to confusion. There is enough of that already.

If “over the counter” hearing devices are made available, I have fears that because of their cost being less they will be tried and when they prove to be ineffective the person will say... “Am I ever glad I didn’t spend \$2000.00 on a hearing aid only to find out they don’t work,” then throw it in a drawer and not even search out what could be beneficial help for their hearing and the communication problem.

Manufacturers of assistive hearing devices... call them hearing instruments, personal sound amplification products, over the counter hearing aids, whatever... are of course very “units” or “numbers” oriented. “The more the better.” They are, however, distant from the end user. Practitioners, on the other hand, are there on a daily basis with the hearing impaired. Yes, we have to “sell” hearing instruments to make a living, but they are sold to truly provide a benefit and be a part of a total hearing rehabilitation process, not to just be hung on the individual and sent on their way.

And the thought of the cost of appropriate hearing help being cost prohibitive is incredible. When you look at the cost of prescriptive drugs and healthcare in general, hearing aids are not that bad. Appropriate hearing instruments should last on average at least five years, with seven or eight years not being out of the question. When the cost for proper help is annualized over this many years, it is not exorbitant. If the field of dispensing hearing instruments was as lucrative as one might think it to be, there would be more clambering to enter this field of service.

I could go on and on regarding help for the hearing impaired. “Over the counter” hearing devices are not the answer. Thank you for your consideration.

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