

Federal Trade Commission

Title: Notice of Workshop and Requesting Public Comments

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

Workshop: Tuesday, April 18, 2017

Comments Due: Thursday, May 18, 2017

I am a user experience researcher living with and specializing in hearing loss. As a former recording engineer, I am comfortable with technology and accustomed to listening closely. Here is my take on the matters raised in the *Hearing Health and Technology Workshop* (Project No. P171200).

1. **FTC:** What information about hearing technology and related health care services is available to consumers who may be shopping for these goods and services? How useful do they find this information?

DW: There is an overwhelming amount of information out there but, with the exception of some associations such as the Hearing Loss Association of America, the info tends to be either marketing collateral or esoteric and technical, with little practical overlap between. Thus the information that is out there is not particularly useful to most consumers.

2. **FTC:** How are hearing aids and other forms of hearing technology commonly distributed and sold? To what extent are new sellers of hearing devices, as well as new methods of distribution and sales, affecting the range of goods, services, and prices available to consumers?

DW: Hearing aids are commonly distributed through audiologists, and a longstanding business model that bundles audiology services with hearing aid products ties the bottom line for the audiologist to their relationship with the hearing aid manufacturer, irrespective of the need of their patient/client.

New methods of distribution and sales and new sellers of hearing devices *are* affecting the range of goods, services, and prices available to consumers – or there would be no call for this workshop. That said, there is a huge amount of confusion in the marketplace, and there remains a vast discrepancy between the number of people who have hearing aids and the number who need them.

3. **FTC:** How are innovations in hearing technology – including hearing aids, personal sound amplification products (PSAPs), and other devices and platforms – changing the competitive landscape and expanding the range of viable options to ameliorate hearing loss? What other innovations and developments are on the horizon?

DW: Even as most technologies have become more robust and more affordable over time, (consider for example the capacity and cost of a computer twenty years ago), the cost of hearing aid technology has remained exorbitantly high.

If the goal is to develop a range of viable options to ameliorate hearing loss, a competitive landscape populated by encroaching PSAPs not only stands to foster innovation in the devices themselves, but also in business models and dissemination of information that better serve the needs of the user/patient/client.

4. **FTC:** To what extent are hearing aids, PSAPs, or “hearables” interoperable with different adjustment or programming tools, as well as other technologies and communications systems? What standard setting efforts are underway and how might standard setting further competition and innovation (or fail to do so)?

DW: There is little interoperability among devices, largely due to lack of standards and interoperability requirements. This limits choice for the user/patient/client and clamps down innovation that could build upon and improve technologies that are developed according to agreed upon standards.

5. **FTC:** To what extent might existing federal and state regulations be modified or streamlined to better accommodate new technologies and business models, consistent with promoting competition and innovation while meeting legitimate consumer protection objectives?

DW: Federal protections already in place for consumer electronics are a good start. We need to also establish protocol for interoperability between and among hearing aids and devices. Additionally, we need the FDA to create a new category of regulation to clarify standards for over-the-counter hearing aids.