Recommendation of the FCC Disability Advisory Committee on Amplified Phones Adopted September 22, 2016

- 1. WHEREAS many Deaf or hard of hearing consumers rely on amplified phones or captioned phones as their primary means of communicating via telephone networks; and
- 2. WHEREAS consumers with amplified phones (including the amplified portion of captioned phones) continue to report to state equipment distribution programs (EDP) and other consumer groups that they were not able to effectively use these devices for telephone conversations due to issues including static, dropped sound, picking up other noises (reported as other conversations or the radio), and amplification not working reliably¹; and
- 3. WHEREAS consumers are often stuck between their network provider claiming an issue with the phone and the phone manufacturer claiming an issue with the network; and
- 4. WHEREAS implementation of a common set of standards for measurement of wireline amplified phone offerings or amplified phone performance would be beneficial to deaf or hard of hearing consumers; and
- 5. WHEREAS TIA's TR-41 Engineering Committee² developed TIA-4953 in response to state distribution programs' complaints regarding the performance of amplified telephones. The TIA-4953 standard provides measurement procedures and performance criteria for amplified telephone handset acoustics focusing on receiver gain, tone control for hearing loss categories, ringer acoustics and level, acoustic hearing aid compatibility, which simulates the usage of a handset by a person with a hearing aid, and magnetic hearing aid compatibility by reference to TIA 1083; and
- 6. WHEREAS many consumers who could benefit from amplified phones will be unfamiliar with the TIA-4953 standards unless there is clear labeling on the phone packaging regarding the use of the standard; and
- 7. WHEREAS TIA's TR-41 Engineering Committee revised the TSB-177-A standard to provide logos which may be offered for use with products that meet the performance requirements established in the ANSI/TIA-4953 (Amplified Telephone Measurement Procedures and Performance Requirements) standard; and
- 8. WHEREAS amplification on captioned phones may be beneficial to a person with hearing loss, even in situations when the captions are turned off; and
- 9. WHEREAS a recent large survey³ on voice telecommunications access conducted by the Rehabilitation Engineering Research Center (RERC) on Telecommunications Access at Gallaudet University found that only about 11% of respondents utilize the FCC clearinghouse to get information about telecommunications products; and

³ Linda Kozma-Spytek, Deaf/Heard of Hearing Technology Rehabilitation Engineering Research Center, Voice Telecommunications Access Survey Results, 2015, http://www.deafhhtech.org/rerc/2016/08/22/voice-telecommunications-access-survey/ (Last accessed: August 22, 2016).

¹ No formal surveys have been completed at this point; however, Telecommunication Equipment Distribution Program Association (TEDPA) and Hearing Loss Association of America (HLAA) report many anecdotal complaints.

² See TR-41 / Performance and Accessibility for Communications Products at http://www.tiaonline.org/all-standards/committees/tr-41

10. WHEREAS if the above is investigated and remedied, it would benefit the greater population in addition to the Deaf and hard of hearing.

NOW, THEREFORE, IT IS-

- 1. RECOMMENDED that the Federal Communications Commission ("Commission") investigate the complaints⁴ regarding amplified phone and phone network compatibility⁵; and
- 2. RECOMMENDED further, the Commission consider efforts to educate staff and raise awareness about wireline telephone performance standards through sources like TIA; and
- 3. RECOMMENDED further, the Commission initiate a rulemaking to recognize TIA-4953 as a standard that meets the referenced performance criteria⁶ and to apply the TIA-4953 standard as a safe harbor for manufacturers of amplified (high gain) telephones, including captioned phones; and
- 4. RECOMMENDED further, that all phones manufactured to meet the TIA-4953 standard are encouraged to use the TSB-177-A labeling and marking guidelines published by TIA in August 2013;⁷ and
- 5. RECOMMENDED further, the Commission require captioned telephones to have the capability of providing high gain (above 18 dB) while the phone is in use (with or without captioning); and
- 6. RECOMMENDED further, the Commission include in their online Accessibility Clearinghouse information for consumers regarding amplified phones that meet the TIA-4953 standard; and
- 7. RECOMMENDED further, the Commission provide an outreach and consumer education program about the Accessibility Clearinghouse in order to encourage consumer utilization.

⁴ As noted in Whereas clause 2.

⁵ As noted in Whereas clause 3.

⁶ See Whereas clause 5. TIA-4953, Amplified Telephone Measurement Procedures and Performance Requirements, http://www.tiaonline.org/

⁷ TSB-177-A provides logos that may be used on packaging and marketing materials for products meeting the performance requirements established in the TIA-4953 standard.