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Before the Federal Communications Commission
Washington, DC 20554

In the Matter of WT Docket No. Improvements to Benchmarks and Related 15-285
Requirements Governing Hearing Aid- Compatible Mobile Handsets
Amendment of the Commission's Rules WT Docket No.
Governing Hearing Aid Compatible Mobile 07-250
Handset

COMMENTS OF JANICE SCHACTER LINTZ

February 16, 2016

INTRODUCTION:

I am Janice Schacter Lintz, CEO of Hearing Access & Innovations (HAI) (f/k/a Hearing Access Program) and the mother of a 21-year-old daughter who is hard of hearing. I am a former member of the Federal Communications Commission (FCC)'s Consumer Advisory Committee, appointed for two terms under Chairman Martin. I am also the author of "How to Buy a Cellphone when you have a Hearing Loss," originally published in Volta Voices (<https://janiceslintz.files.wordpress.com/2009/02/vv-cellphone-109.pdf>), which was the most frequently downloaded article by Better Hearing Institute when published and the first article that explained to consumers with a hearing loss how to select a suitable cell phone.

I frequently write on topics related to hearing loss and consumer education, and my articles have been published in the Huffington Post. In addition, I worked with Apple to bring hearing induction loops to their US stores. At the time, Apple US was unaware that their United Kingdom operations had hearing induction loops in their stores. Apple added a hearing induction loop to its SoHo (New York City) store and was supposed to roll out loops to all the other US stores but did not do so.

DISCUSSION:

I offer the following supplementary comments in response to Apple's submitted comment. Apple claims that its "Made for iPhone ("MFi") hearing aid platform represents a substantial improvement to consumers over devices that are deemed accessible by today's HAC rules. The platform employs a wireless protocol that incorporates Bluetooth low energy technology to enable compatible hearing aids to interact directly with iPhones and other supported devices via a digital wireless connection. Apple seeks to have the Commission recognize the MFi Hearing Aid Platform as a viable alternative for hearing aid compatibility compliance.

However, Apple's submission is really about elimination of universal hearing access to ensure

proprietary pairing of its products and to drive business to its vendors. We have already seen similar actions by Apple with its other platforms and products. This was my concern when I questioned key staff at a 2014 public FCC meeting.

New and better technology is one thing, but proprietary access is quite another. The Food & Drug Administration (FDA), unlike National Health in the UK, does not require telecoils in hearing aids. However, two-thirds of hearing aids sold in the US, as well as all cochlear implants, now have telecoils, which only add about \$50 to the cost. Apple's approach would likely result in the elimination of telecoil reception on cell phones, which would have a positive outcome for Apple but not for people who use telecoil-equipped hearing aids and cochlear implants.

As the recent Steve Jobs movie clearly indicates, Apple has a long history of using closed systems that are incompatible with anything but their own products, as with the Macintosh. They seek to limit the consumer's choices and create a system they control.

In addition, Apple repeatedly looks for ways to "lighten the load" on its products in order to minimize costs and maximize profits, and it constantly eliminates circuitry it believes to be expendable. (The new MacBook now only has only one USB portal.) Eliminating the telecoil permits Apple to make space for the MFi and cut costs.

Although a person who doesn't have a hearing loss might view Bluetooth as an acceptable alternative, it isn't. Bluetooth has connectivity issues and costly battery drain. While it is irritating for a hearing person to be unable to connect a phone via Bluetooth, it is quite a different situation for a person with hearing loss who cannot hear without the connection. Bluetooth's high battery costs put it out of reach for many consumers. In contrast, telecoils do not use battery power and connect electromagnetically instead. (More details on how a telecoil works can be found at <https://janiceslantz.files.wordpress.com/2014/11/telecoil-article-veryfinal-9-12.jpg>.)

But there is more here at stake than just hearing aid compatibility for cell phones, since the FCC's decision will have ripple effects outside the telecommunications area. Eliminating telecoil receptivity on cell phones will likely lead to the elimination of telecoils in US hearing aids, which will in turn prevent hearing induction loops from being used for communication access, including at Apple's Genius Bars, transportation, theaters, museums and other retail operations.

Apple is not installing further hearing induction loops in its retail operations despite building VERY noisy retail operations in glass cubes and with high ceilings. In fact, my daughter could not hear at the New York City Madison Avenue or Providence, Rhode Island Genius Bar. Apple has ignored the complaints.

Despite it's seeming concern for hearing aid innovation, Apple is trying to ensure that it controls the innovation by implementing a proprietary closed system that is incompatible with hearing access systems around the world, including hearing induction loops.

CONCLUSION

Cell phones have become an integral part of our global daily life. It is imperative that people with hearing loss be afforded the same options and opportunities as everyone else. Apple is welcome to include its new technology in addition to but not instead of telecoil access. No one should be unable to hear unless they use proprietary and closed operating systems, nor should they be required to purchase new hearing aids, as my daughter needed to do, in order to hear on the phone. Apple and all companies must be required to maintain telecoil accessibility on their handheld devices.
