

JUSTIFICATION OF NON-SUBSTANTIVE CHANGES

The Commission is submitting this non-substantive change request to the Office of Management and Budget (OMB) to amend the Commission's hearing aid compatibility rules to implement the final rules adopted by the Commission in the Report and Order in WT Docket No. 17-228, FCC 18-167 (2018 Report and Order). Prior to the 2018 Report and Order, the Commission required both wireless device manufacturers and wireless service providers to file FCC Form 655 annually. The Commission used this form to track device manufacturer and service provider compliance with the Commission's hearing aid compatibility provisions. The new rules adopted in the 2018 Report and Order eliminate wireless service providers' requirement to file this form annually.¹ On a going-forward basis, only wireless device manufacturers must continue to do so. The Commission made this change to reduce regulatory burdens and eliminate unnecessary and outdated information collection requirements. As a result of this change, the Commission is revising FCC Form 655 and the form's instructions to eliminate all references to wireless service providers. As modified, the form will only address wireless device manufacturer filing requirements. Because the Commission is not making any changes to the form and its directions as they relate to wireless device manufacturers requirements, the Commission does not anticipate any impact on the number of respondents, responses, burden hours, or costs beyond what has already been submitted and approved by OMB regarding device manufacturers. As a result, the Commission believes that this is a non-substantive change.

¹ We note that the Commission replaced the obligation of wireless service providers to annually file FCC Form 655 with a new obligation that service providers post certain information on their publicly accessible websites, maintain certain information for a period of time, and to annually file a simple certification of compliance. The paper work act burden associated with these new requirements will be the subject of a future Commission filing with OMB seeking approval for these new burden requirements.