

### **JUSTIFICATION OF NON-SUBSTANTIVE CHANGES**

The Commission is submitting this non-substantive change request to the Office of Management and Budget (OMB) 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 wireless device manufacturer and wireless service provider compliance with the Commission's hearing aid compatibility provisions. The Commission's new rules eliminate the requirement that wireless service providers continue to annually file FCC Form 655 and replace it with a requirement that service providers file a streamlined annual certification. On a going-forward basis, only wireless device manufacturers must continue to file FCC Form 655.

As a result of these changes in the Commission's hearing aid compatibility reporting requirement, the Commission has modified FCC Form 655 and the related instructions to make clear that only wireless device manufacturers will file this form in the future. These modifications to the form and instructions has included deleting all references to wireless service providers.

On February 4, 2019, the Commission submitted to OMB for its review and approval the revised FCC Form 655 and the related instructions.<sup>1</sup> On February 21, 2019, OMB approved this request.<sup>2</sup>

Subsequent to this approval, the Commission has made further changes to FCC Form 655 and the instructions. These changes have been made to clarify and simplify the form and instructions. Because the Commission is not making any changes to the form and its directions that affect wireless device manufacturers' reporting requirements or burdens, the Commission believes that these changes qualify as non-substantive. 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. The Commission therefore requests approval of these non-substantive changes to FCC Form 655 and the related instructions.

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<sup>1</sup> See [https://www.reginfo.gov/public/do/PRAViewICR?ref\\_nbr=201902-3060-001](https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=201902-3060-001) (listing the Commission's submitted and approved non-substantive hearing aid compatibility information collection request).

<sup>2</sup> *Id.*