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Comment on a Citizen Petition

Dockett Number: 2003P-0362/CP 1

I am writing in support of the Citizen's Petition by Mead Killion which seeks to allow some hearing aids to be sold Over-The-Counter.

I suggest that scientific evidence would support this petition's aims, and I also suggest that there is little or no valid scientific evidence that would support the opposing position. I say this based upon over 20 years of active research into speech recognition by the hearing impaired individual, during which time I have also served as Associate Editor for the Journal of Speech and Hearing Research and also the Journal of the Acoustical Society of America. During this time I have been acutely aware of nearly all published research in this area, as well as publishing a good deal on this topic myself.

Several relevant articles are attached to this letter which support the position that consumers can do as well for themselves choosing a hearing aid as can professional dispensers (especially for mild to moderate hearing loss).

Cienkowski and Speaks (Journal Speech Language and Hearing Research, 43, 1205-1210, 2000) - this article demonstrates that hearing-impaired individuals can accurately determine by themselves how well they recognize speech. This demonstrates that consumers could accurately rank-order the effectiveness of various frequency responses for hearing aids without outside assistance.

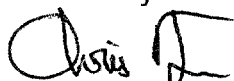
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Horwitz, Turner and Fabry (Journal of Speech, Language and Hearing Research, 34, 1185-1196, 1991) and van Dijkhuisen, Festen and Plomp (Journal of the Acoustical Society of America, 86, 621-628, 1989) - these two articles demonstrate that changes in the frequency response of a hearing aid make no difference to speech intelligibility as long as audibility of the speech is not compromised.

Thus, the idea of a professional dispenser attempting "fit a target" frequency response is not crucial. In addition, there are several common "fitting formulas" and "target prescriptions" that have failed to distinguish themselves in clinical trials, again demonstrating that trying to fit to a particular target is not productive. I also call your attention to the recent article by Harvey Dillon in the October 2003 issue of The Hearing Journal (the professional trade journal of hearing-aid dispensers). Dr. Dillon is perhaps the world's leading expert on "target gains" and hearing aid prescriptions. He states that "...few of the non-linear prescription methods have been thoroughly evaluated or compared with each other." Thus any argument against this petition based upon the importance of the expertise of the professional dispenser in applying prescriptions would appear to be invalid.

Thank you allowing me to point out these studies to your committee.



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