

## Rich Fabina

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**From:** oetech@fccsun27w.fcc.gov  
**Sent:** Wednesday, December 10, 2014 2:58 PM  
**To:** rfabina@acbcert.com  
**Subject:** Response to Inquiry to FCC (Tracking Number 857033)



### Office of Engineering and Technology

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#### Inquiry on 12/07/2014 :

##### Inquiry:

Gentlemen:

ACB has a client who is getting a change in FCC ID number for a modular transmitter. However the label exhibit shows the text for this device to be on two separate lines not on one line as specified in Section 2.925(a)(1) of the FCC Rules.

The transmitter is a small modular transmitter designed to be installed inside another enclosure and the label area is small as shown in the attached response. The text of the label is displayed diagonally across the shield of the modular transmitter but it is not on one line as the Rules specify.

The applicant would like to know if the FCC will accept the alternative labeling shown in the second exhibit. The first exhibit contains the applicant's justification for labeling the product in this manner.

Please let me know if you require anything further to reach your decision.

Rich Fabina

Reviewing Engineer

American Certification Body

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#### FCC response on 12/10/2014

**The request by the applicant is acceptable in compliance with the FCC Rules stated below and guidance state below:**

FCC ID XXX123. XXX—Grantee Code 123—Equipment Product Code **(2)** Any other statements or labeling requirements imposed by the rules governing the operation of the specific class of equipment, except that such statement(s) of compliance may appear on a separate label at the option of the applicant/grantee.

Or

Electronic labelling device. Review FCC Publication No. 784748 D02 Labelling Vo1 dated July 11, 2014.

07/11/2014

## **ELECTRONIC LABELING GUIDANCE**

### **I. INTRODUCTION**

#### **II.**

Equipment subject to certification is required to bear a nameplate or a label listing the FCC Identifier (FCC ID) and any other statements or requirements imposed by the rules governing the operation of that specific equipment.<sup>1</sup> Similarly, devices subject to Declaration of Conformity (DoC) are required to be uniquely identified.<sup>2</sup> The rules require the nameplate or label to be permanently affixed to the equipment and that it shall be visible to the purchaser at the time of purchase.<sup>3</sup> In many instances, it is not practically feasible or appropriate to place a permanent legible label on the device. Many consumer devices have very small surface areas for a label, or when etched on the surface, the labeling may cause damage or require very expensive techniques. In such instances, the rules permit the Commission to approve alternative means of displaying the required information.<sup>4</sup> The rules already permit devices approved as software-defined radios and modular transmitters to display compliance information electronically through a display where available.<sup>5</sup>

<sup>1</sup> See 47 C.F.R. § 2.925 (a).

<sup>2</sup> See 47 C.F.R. §2.1074

<sup>3</sup> See 47 C.F.R. § 2.925(d).

<sup>4</sup> See 47 C.F.R. § 2.925(f).

<sup>5</sup> See 47 C.F.R. §§ 2.925(e)

And 15.212 (a) (1) (VI) (B) and KDB Publication 442812, SDR Apps Guide. This document provides guidance on how devices with an integrated display screen can present the required label information electronically (e-label) in lieu of a physical label or nameplate. This guidance applies to all devices which have an integral (non-removable) display screen and are currently subject to certification or DoC requirements. These include devices that have an integrated display or devices that are subject to rules for software-defined radios or modular transmitters and are used in a host device that has an integrated display.

Further Guidance can be found in FCC Publication No. 784748 D02 e labelling v01 Page 1 dated July 11, 2014.

### **Attachment Details:**

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