

SEBOTEK

HEARING SYSTEMS, LLC

Date: November 4, 2015
Subject: Labeling; Marking of Device With FCC ID and IC
From: Jim Larson, QARA Manager
To: TCB Registration – HD3 Device

Jim Larson

The labeling requirements for our wireless hearing aid specify that the device be marked with the FCC ID and IC unless prohibited because of device size or the printing is too small to be readable. Our established marking process uses laser printing to permanently mark device cases with customer information on the lower case panel. This area is chosen because of its relative "flatness", limited texture, and uninterrupted printing area to allow consistent marking of font characters.

Lower case panel of device showing approximate printable area:



Although the laser is capable of smaller point font, we have found that the above design requirements and case color options limit the print strings to a maximum of thirteen (13) characters to assure readability. The total printable area of the lower panel is approximately 0.048 in². Texturing on device surfaces is a necessary design feature that aids those with limited dexterity; a common problem for individuals of the hearing impaired demographic. The readability of printed characters on our device is also influenced by contrast of marked characters with the substrate color. Case colors provide necessary cosmetic concealment of the hearing aid depending on skin tone.

Properly identifying the FCC and IC license numbers on the device would require sixteen characters (e.g. FCC ID 2ADKC-WHD), with a second lines to add the IC number (IC 20701 WHD). This is outside current design capability. Recognizing the limitations in placing this information on the device, we are requesting an exemption to not print the FCC and IC license numbers on the device, and instead would assure the license information is printed prominently in the user guide and on labeling of each individually packaged hearing aid.