



4045-A Campbell Ave.  
Menlo Park, CA 94025

3/12/2019

Attention: Application Examiner

RE: Request for Labeling and FCC ID display exemption  
Applicant: Earlens Corporation  
FCC ID: 2AGDU-EL2PIN

To Whom It May Concern:

Request is hereby submitted by Earlens Corporation to exempt the Audio Processor device for the referenced FCC identifier from requirements pertaining to including a label and displaying the FCC identifier on the device itself (Section 2.925, Section 2.926) Earlens Corporation, would like to include the FCC identifier for the device in the associated User Manual only.

Rationale for request for exemption:

- The top cover and the bottom housing of the device are removable using fingernails (i.e. no special tools). See attached photo of disassembled device with bottom housing on the left, electronics assembly in the center and top cover on the right.
- Because the housing is removable it does not meet requirements as required per 784748 D01 Labelling Part 15 & 18 Guidelines, Section 4. Label Location for Part 15 and 18 Devices and we are unable to print FCC ID on these removable surfaces.
- We believe the products referenced below constitute a precedent to our request.
  - Resound X26BE70
  - Starkey EOA-IRIS-HA

In support of our argument please refer to attached drawings.

If you have questions or need further information, please contact the undersigned.

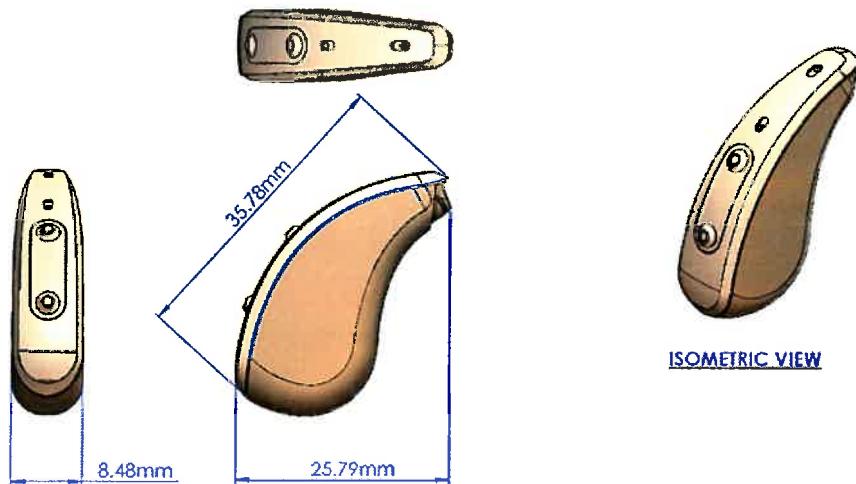
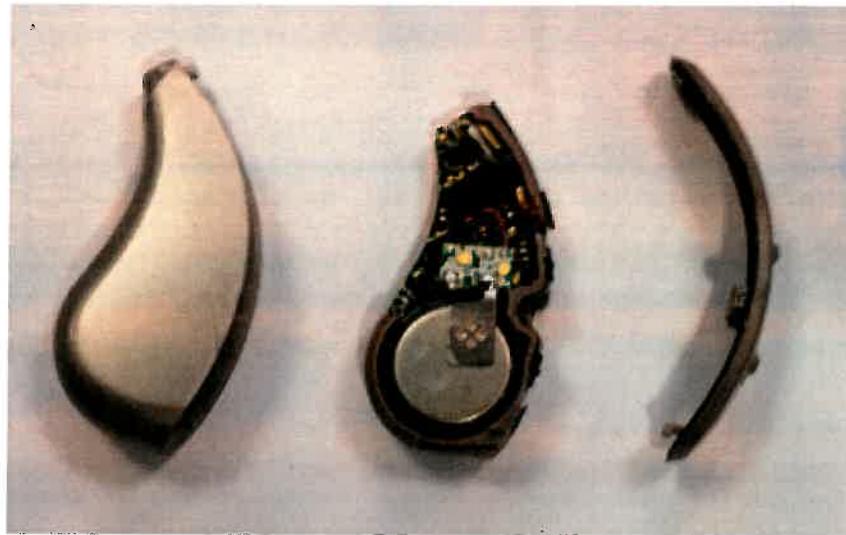
Sincerely,

Greg Koskowich  
VP, R&D Sound Processing  
Earlens Corporation

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Product ID:	EARL-001	Product Description:	earlens	EARL-001
Component:	EARL-001	Serial Number:	00000000000000000000000000000000	00000000000000000000000000000000
Model:	EARL-001	Manufacture Date:	2023-01-01	2023-01-01
Color:	Tan	Warranty:	1 Year	1 Year
Weight:	10g	Dimensions:	35.78mm x 25.79mm x 8.48mm	35.78mm x 25.79mm x 8.48mm
Material:	Plastic	Power Source:	Rechargeable	Rechargeable
Function:	Volume Control	Control:	Bluetooth	Bluetooth
Features:	Waterproof	Memory:	10	10
Charging:	USB-C	Range:	10m	10m
Usage:	Personal	Language:	English	English
Accessories:	Charging Case	Software:	earlens app	earlens app
Notes:	None	Notes:	None	None
A:	P/N:	1234567890	1234567890	1234567890
Serial:	Model:	00000000000000000000000000000000	00000000000000000000000000000000	00000000000000000000000000000000