Vicki Albertson

Thanks for doing this Sean,

We can submit the inquiry to ISED, if you would like. For the FCC, you have demonstrated the following:

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Page 3

dimensions of the equipment and its label area.

When the device is so small, or for such use that it is impracticable to label with a font size that is four-points or larger (and the device does not utilize electronic labeling), then the FCC ID shall be placed in the user manual, and the FCC ID shall also be placed either on the device packaging or on a removable label attached to the device.

[ElementSignature]

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From: Sean MacKellar <SeanMacKellar@smarttech.com>
Sent: Thursday, May 18, 2023 9:33 PM
To: Jody House <jody.house@element.com>
Cc: Vicki Albertson <vicki.albertson@element.com>
Subject: RE: Element Certification Tracking System - Exhibit Status Update - TS-SMTE-0003 - label_and_location_(industry_canada_id).TS-SMTE-0003.(1).pdf
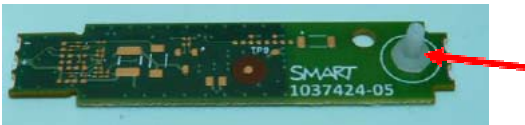
Hi Jody,

I printed a mockup of a pen label today using Arial 4pt font.
Please see attached images.
Note, I'm trying to avoid placing the label over any components as it may interfere with the alignment when installing in the ben body. Note, there are guide rails in the ben body for the pen board alignment, and application of the label on top of components could interfere with assembly.

The attached photos shows that the label interferes with a plastic screw / nut that is part of the assembly, regardless of which side of the board the label is applied.
See below:

As discussed, it is not feasible to apply a label to this board.
We need to rely on the packaging, documentation, and panel e-labeling.

Please provide more detail on the ISED / FCC inquiry process to request permission not to apply a label to this board.
Will the inquiry process to request this permission cause additional delays in certification?
Can the reviewer accept the PQXMOD1 Label & Location exhibit with this additional information?

On a separate note, for the IDQXMOD1, I have informed the team of the need to label the Tool Sense Controller board.
We will be processing a change request to add a label to the BOM.
In the meantime, I'm going to update the IDQXMOD1 Label & Location exhibit to include a module label. There is plenty of "real estate" on the Tool Sense Controller board to accommodate a label.

Regards,
Sean

From: Jody House <jody.house@element.com>
Sent: Thursday, May 18, 2023 10:40 AM
To: Sean MacKellar <SeanMacKellar@smarttech.com>
Cc: Vicki Albertson <vicki.albertson@element.com>
Subject: RE: Element Certification Tracking System - Exhibit Status Update - TS-SMTE-0003 - label_and_location_(industry_canada_id).TS-SMTE-0003.(1).pdf

Sean,

We can submit an inquiry to ISED for the label on the pen board. For the FCC, if you want to see permission to not label the pen board, you will need to generate a label sample with font size 4 and show that it will not fit on the board.

Jody

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From: Sean MacKellar <SeanMacKellar@smarttech.com>
Sent: Thursday, May 18, 2023 10:33 AM
To: Jody House <jody.house@element.com>
Cc: Vicki Albertson <vicki.albertson@element.com>
Subject: RE: Element Certification Tracking System - Exhibit Status Update - TS-SMTE-0003 - label_and_location_(industry_canada_id).TS-SMTE-0003.(1).pdf

Hi Jody,

As we have discussed previously, the PQXMOD1 is small and impractical to apply a label to the board. Plus, it will be installed in the pen and not visible to the end-user (nor will the module be sold).
To address labeling requirements, we are relying on e-labeling within the panel for which the pen is an accessory.
The e-labeling on the panel identifies the pen model and includes text that the pen model: PQX-1 contains IC: 4302A-PQXMOD1.

Additionally, our user document that will accompany the pen (as well as the packaging that the pen is shipped within) will identify the manufacturer (SMART Technologies), pen model number, and text indicating the pen "Contains IC: 4302A-PQXMOD1".

This is all described in the PQXMOD1 Label and Location exhibit.
Based on your reply below, I feel we have met the requirements and still don't understand why the reviewer rejected this exhibit.
Furthermore, it is inconsistent with the reviewer's acceptance of the IDQXMOD1 Label and Location exhibit.

Please confirm if the reviewer will accept the PQXMOD1 Label and Location exhibit or insists it requires correction.

Regards,
Sean

From: Jody House <jody.house@element.com>
Sent: Thursday, May 18, 2023 8:00 AM
To: Sean MacKellar <SeanMacKellar@smarttech.com>
Cc: Vicki Albertson <vicki.albertson@element.com>
Subject: RE: Element Certification Tracking System - Exhibit Status Update - TS-SMTE-0003 - label_and_location_(industry_canada_id).TS-SMTE-0003.(1).pdf

Sean,
The actual module will have to the full label – both HVIN and ISED certification number.

The host will only need 'contains IC: XXXXX'.

Jody

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From: Sean MacKellar <SeanMacKellar@smarttech.com>
Sent: Wednesday, May 17, 2023 4:49 PM
To: Jody House <jody.house@element.com>
Cc: Vicki Albertson <vicki.albertson@element.com>
Subject: FW: Element Certification Tracking System - Exhibit Status Update - TS-SMTE-0003 - label_and_location_(industry_canada_id).TS-SMTE-0003.(1).pdf

Hi Jody,

I received the system notification below suggesting a correction to the PQXMOD1 label/location exhibit is required for ISED.
The comment indicates the HVIN must be listed somewhere on the label and could be preceded with "Model:".

This seems inconsistent in that the IDQXMOD1 label/location exhibit was approved, and the QX Series regulatory labels do not include the HVIN.

My experience with host product labeling is that the model of the host product is required. In the case of PQXMOD1, the host product is Model: PQX-1.
The label also includes text to indicate the host product "Contains IC: 4302A-PQXMOD1".
I've never seen the HVIN of the radio module applied to a host product. For example, we do not place the HVIN of the WiFi/BT radio on the label; we only apply the "Contains IC: [company code-radio ID]".

I'm not understanding why the reviewer is requesting this correction.
According to the exhibit requirements in Element's cert tracking system, we are meeting the requirements for IC labeling:

Label and Location (Industry Canada ID)

The Certification Number on the label shall appear as follows: "IC:XXXXXX-YYYYYYYY"
Where: "XXXXXX" is the Industry Canada-assigned Company Number (CN) of not more than 6 alphanumeric characters;
"YYYYYYYY" is the applicant-assigned Unique Product Number (UPN) of not more than 11 alphanumeric characters; and characters are limited to capital letters (A-Z) and digits (0-9).

Please note that the Model # of the device needs to be included on this label, or somewhere visible on the device.

Per RSS Gen 5.2: The label for medical implants designed to be used within the human body shall be placed on the package and in the user manual.

Devices operating in the 5250 - 5350 MHz band shall be labeled "for indoor use only". Alternatively, that text can be included in the user manual and not on the device. Note however the user manual is the only option available for devices operating in the 5150 - 5250 MHz band. In all cases the user manual shall contain instructions "for indoor use only".

There is no mention here of requiring the HVIN (radio model) on the label.

Can you please explain or discuss with the reviewer?

Thanks,
Sean

From: system.enw@element.com <system.enw@element.com>
Sent: Wednesday, May 17, 2023 4:18 PM
To: Sean MacKellar <SeanMacKellar@smarttech.com>
Subject: Element Certification Tracking System - Exhibit Status Update - TS-SMTE-0003 - label_and_location_(industry_canada_id).TS-SMTE-0003.(1).pdf

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Project: **TS-SMTE-0003**

The following Label and Location (Industry Canada ID) exhibit, (**label_and_location_(industry_canada_id).TS-SMTE-0003.(1).pdf**), has been reviewed, and the status was changed to **Awaiting Correction**.

Comments: Please note that the HVIN must be listed somewhere on the label. This can be preceded by "Model:".

Please log onto the Element Certification Tracking System to review the project status.

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