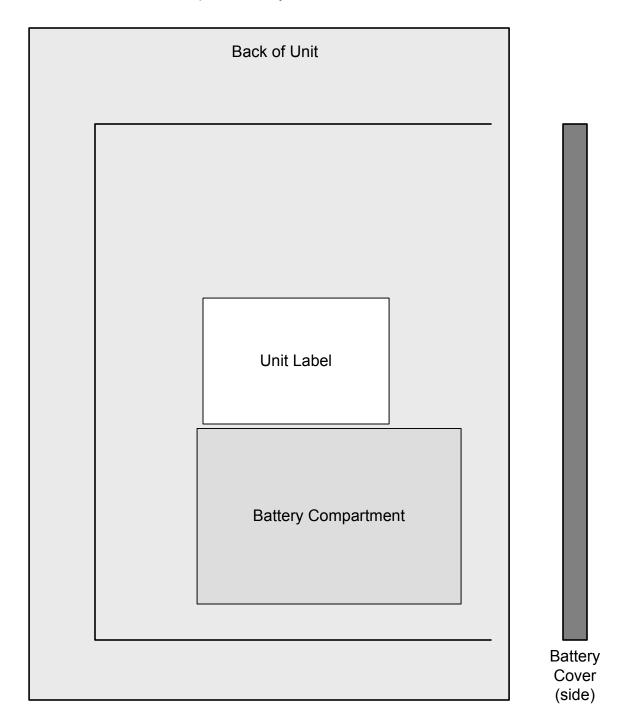


## Model D00111 Unit Label Location

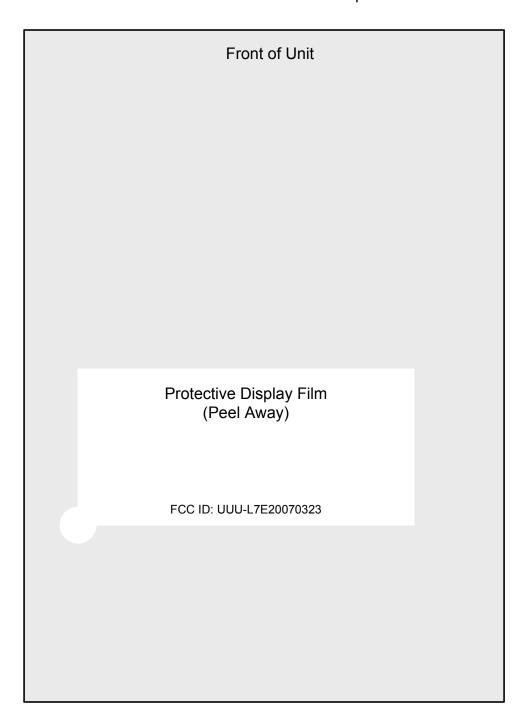
FCC ID is permanently attached to device.



(Not to Scale)

# Model D00111 FCC ID Location on Protective Display Film

FCC ID is visible at time of purchase.



(Not to Scale)

### Payne LLC The Neumours Bldg, Suite 1414 Wilmington, Delaware 19801

April 2, 2007

Federal Communications Commission Laboratory Division 7435 Oakland Mills Road Columbia, MD 21046

Re:

FCC ID No. UUU-L7E20070323

FCC 47 CFR Part 15B FCC 47 CFR Part 22/24

**UNIT LABEL LOCATION** 

Ladies and Gentlemen:

Enclosed for your consideration is an email exchange between the FCC's Generic Office of Engineering Technology and G. Snyder of PCTest Lab, dated March 20, 2007. The email exchange confirms that the requirements of Section 2.925 are met by the combination of (a) the permanent attachment of the FCC ID to the main body of the unit; and (b) the inclusion of an additional FCC ID label, visible at the time of purchase, appearing on the display screen's removable protective cover.

Respectfully,

Stephanie Burns

President, Payne LLC

#### Attachment A

From: Generic Office of Engineering Technology [mailto:oetech@fccsun27w.fcc.gov]

Sent: Tuesday, March 20, 2007 2:55 PM

To: gsnyder@pctestlab.com

Subject: Response to Inquiry to FCC (Tracking Number 619762)

#### Inquiry:

To follow-up to Inquiry 714592 (see attached) the FCC ID label is permanently attached to the main body of the unit and not the removable battery cover. As the label is permently attached it complies with the requirements of 2.925. However, the unit is delivered to the end user ready for use out-of-the-box and there is no need to remove the plastic battery cover and therefore the label would not be visible at time of purchase. Is it then permissible to also add an additional FCC ID label that appears on a removable protective cover on the display screen so that the FCC ID is visible at time of purchase? Both requirements of being permanently attached and being visible to the end user at time of purchase would therefore be fulfilled.

#### Response:

Yes, the device may be equipped with a means such as a user display screen to display the FCC Identification normally contained on the nameplate or label, per Section 2.925(e).

From: Generic Office of Engineering Technology [mailto:oetech@fccsun27w.fcc.gov]

Sent: Tuesday, March 20, 2007 11:23 AM

To: gsnyder@pctestlab.com

**Subject:** Response to Inquiry to FCC (Tracking Number 714592)

#### Inquiry:

I have a client that has a permanently attached label containing the FCC ID placed on the back of the unit under a removal battery compartment cover. The unit is to be sold with the battery and cover already installed. In order to comply with the requirements of the FCC ID being visible at the time of purchase they want to also add the FCC ID to a protective plastic cover that goes over the display and is removed by the end user, thus the FCC ID would be visible at time of purchase. Additionally, if necessary, they could add a label location description to the manual. Please see attached drawing.

#### Response:

It is prohibited to place the ID label on the battery cover of the device. Pursuant to Section 2.925(d), the nameplate or label must be "permanently aff! ixed" to the equipment and be readily visible to the purchaser at the time of purchase.

Section 2.925 (d)(1) states that "permanently affixed" means that the required label data must be etched, engraved, stamped, indelibly printed, or otherwise permanently marked on a permanently attached part of the equipment enclosure (which a battery cover is not permanently attached, but removable...). Alternatively, the required information may be permanently marked on a nameplate or label of metal, plastic, or other material fastened to the equipment enclosure by welding, riveting, etc., or with a permanent adhesive. Such a nameplate must be able to last the expected lifetime of the equipment in the environment in which the equipment will be operated and must not be readily detachable. Reference our rules in CFR 47 at http://www.fcc.gov/oet/info/rules.

Please further note that Section 2.925(f) states. . . "Where a permanently attached label is not desirable or feasible, an alternate method may be used if approved by the Commission." The proposed alternative method of identification and the justification for its use must be included with the application for equipment authorization when filed.

Guidelines for labelling and user Information for Part 15 and Part 18 devices are posted on the FCC Web Site page (<a href="http://www.fcc.gov/oet/ea/">http://www.fcc.gov/oet/ea/</a>) under "Labelling Guidelines"; or by going directly to <a href="http://www.fcc.gov/oet/ea/Labelling Guidelines">http://www.fcc.gov/oet/ea/Labelling Guidelines</a> Parts 15 and 18 final.pdf