



Minelab Electronics  
Pty. Limited

ABN 35 008 208 446  
2 Second Avenue  
Mawson Lakes SA 5095  
Australia

PO BOX 35  
Salisbury South SA 5106  
Australia

**Federal Communications Commission**  
Authorization and Evaluation Division  
7435 Oakland Mills Road  
Columbia, MD 21046

Date: 24 July 2025

Subject: FCC application – FCC ID: Z4C-0056

As per FCC 2.935(b):



**§ 2.935 Electronic labelling of radiofrequency devices.**  
Any radiofrequency device equipped with an integrated electronic display screen, or a radiofrequency device without an integrated screen that can only operate in conjunction with a device that has an electronic display screen, must display their FCC identifier, warning statements, or other information electronically. Any other information that the Commission's rules would otherwise require to be shown on a physical label attached to the device must also be displayed electronically.  
(a) Devices displaying their FCC identifier, warning statements, or other information electronically must make instructions on how to access the information in the operating instructions. Inserts in packaging material, or otherwise, must provide specific instructions on how to access the information in the operating instructions or other instructions that are attached to the product related to the device. Where a Web site exists, the packaging material must provide specific instructions on how to access the Web site.  
(b) Devices displaying their FCC identifier, warning statements, or other information electronically must permit access to the information without requiring special codes, accessories or permissions and the access to the information must be provided in no more than three steps. The steps may include steps for use of screen locks, passcodes or similar security protection designed to control overall device access.  
(c) The electronically displayed FCC identifier, warning statements, or other information must be displayed in a manner that is clearly legible without the aid of magnification.  
(d) The necessary label information must be programmed by the responsible party and must be secured in such a manner that it cannot be easily removed.  
(e) Devices displaying their FCC identifier, warning statements, or other information electronically must also be labeled with a physical label that contains the FCC identifier, the model number, and the identification of a Web page that hosts the relevant regulatory information that permits the consumer to access the information without requiring special codes, accessories or permissions and the equipment authorization requirements. Devices can be labeled with a stick-on label, printing on the packaging material, or otherwise. The physical label must be durable and intended to survive normal shipping and handling and must only be removed by the customer after purchase.  
182 FR 50827, Nov. 2, 2007

Instructions to access the electronic labelling are provided in document "D40056\_Label"

This device utilizes E-labelling via LCD. Device packaging (each unit of product) shows how to access regulatory information (E-label) on the device screen.

## E-Label Requirements – Per [KDB Publication 784748 D02](#)

### Section 4.1

#### User Steps to Access Information

##### 4.1 User Steps to Access Information

Users must be able to access the regulatory information without requiring special access codes or permissions, and in all cases the information must be accessible in no more than three steps from a product's main or home menu.<sup>5</sup> An example access process is as follows.

##### Starting from Main or Home Menu:

Step 1 – accessing submenu (for example, "Settings")

Step 2 – access submenu (for example, "Legal and Regulatory")

Step 3 – access submenu (for example, "Regulatory", where applicable regulatory information is displayed)

- a) Following product assembly, it is possible, without any security, password or special functions, other than indicated two steps (refer D40056\_Label), to view the required regulatory information.
- b) This information is accessed via two steps

Please confirm and describe the steps to access the information (as per above)

## **Section 4.2**

**4.2 Products must not require special accessories or supplemental plug-ins (e.g., the installation of a SIM/USIM card) to access the information.**

Instructions must be provided with the product at the time of purchase, in the user manual, operating instructions, packaging material, quick guide pamphlet, etc. Alternatively, a product-related website is permitted, if a reference (URL) to obtain the website information is provided at the time of purchase in the user manual, operating instructions, packaging material, quick guide pamphlet, etc.

Access to regulatory information must be provided without special codes, accessories, or permissions beyond the normal security protection to unlock the screen, sign-in page, or overall product access.

Following product assembly, it is possible, without any security, password or special functions, other than indicated two steps (refer D40056\_Label), to view the required regulatory information.

## **Section 4.3**

**4.3 Readability of Regulatory Information**

The FCC ID, warning statements, or other information must be displayed electronically in a manner that is clearly legible without the aid of magnification.<sup>6</sup>

The FCC ID is included on the product as E-labelling and is indicated on the product packaging, refer D40056\_label. The FCC 15.19 statement is included in paper form, included with each device. In both instances, text is legible without magnification.

## **Section 4.4**

**4.4 Regulatory Information must be Secure**

Both regulatory information and dedicated exclusive application(s) or script(s) must be secured and implemented in a factory-set-unalterable format.<sup>7</sup>

The regulatory information must be capable of being retrieved and displayed locally, and under the control of the end user in possession of the product.

The method must be secure, such that the application or script ensures that the regulatory information correctly displayed.

This indicated regulatory information is secure and cannot be changed by the user. The only way this information may be changed would be through a complete, secure software update package from Minelab. It is not possible to change this information on the device. The regulatory information may be accessed at any time by following the instructions provided with each device on the packaging.



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## **Section 4.5**

### **4.5 Physical and Temporary label for Purchasing and Importation**

When e-labeling is used, a physical temporary label is also required on the product, or a label on the packaging, at the time of importation, marketing, and sales.<sup>8</sup> The physical label can be a summary version of the required regulatory information, such that the product can be identified as complying with the FCC's equipment authorization requirements. The information may simply be the FCC ID for products subject to certification.

Products imported that are already packaged for sale and have a physical temporary label will satisfy this requirement. However, for products imported in bulk and not packaged individually, it is acceptable to use a temporary removable adhesive label on the product, or temporary or permanent labels on the shipping packaging or protective bags. Any removable adhesive label shall be of a type intended to survive normal shipping and handling.

Device is imported in individual packages with FCC Certification number and model identification number located on device packaging.

Refer to D40056\_label for label and packaging details.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mark Lawrie'.

Mark Lawrie