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Sent: Friday, June 28, 2013 12:18 PM
To: Randall Thompson Intertek
Subject: Response to Inquiry to FCC (Tracking Number 402781)

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Office of Engineering and Technology

Inquiry on 06/25/2013 :
Inquiry:

We have had recent questions with respect to the required format and statements on product labels for Part 15 radio TCB submittals. Specifically, we have understood the requirements to be as follows:

FCC ID: XYZ-ABCDEFGH

(where XYZ is FCC Company Grantee Code and ABCDEFGH is the unique product identifier determined by the manufacturer)

In addition, the following verbiage is required to be placed on the product label:

This device complies with part 15 of the FCC Rules. Operation is subject to the following two conditions:

- (1) This device may not cause harmful interference, and
- (2) this device must accept any interference received, including interference that may cause undesired operation.

The exception is, if the product is too small (smaller than the palm of a hand) to support a label with the required verbiage above, this verbiage can be placed in the user manual. The FCC ID is still required on the product label.

Question: Are there any circumstances whereby the required verbiage (not the FCC ID) can be omitted from the product label and placed in the user manual - even if the product is larger than the "palm of a hand"? We have seen numerous products on the market (iPad for example) that appear to have obtained an exemption to the above requirements.

Reference: FCC 2.925(f) "Where it is shown that a permanently affixed nameplate is not desirable or is not feasible, an alternative method of positively identifying the equipment may be used if approved by the Commission."

FCC response on 06/28/2013

Section 15.19 (a) (5) permits that if the statement on the device is not practicable, then it can be placed in the manual, packaging or pamphlet. This applies for both Verification and Certification. Based on your statement, that it is not practical on the device, the rule permits you to place it in the manual. You can have the TCB call me to confirm. 301 362 3051.

15.19 (a) (5) 5) When the device is so small or for such use that it is not practicable to place the statement specified under paragraph (a) of this section on it, the information required by this paragraph shall be placed in a prominent location in the instruction manual or pamphlet supplied to the user or, alternatively, shall be placed on the container in which the device is marketed. However, the FCC identifier or the unique identifier, as appropriate, must be displayed on the device.

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