
To Whom It May Concern:

Doppler Labs, Inc. requests that the product line of Here Active Listening™ (FCC ID: 2AF9A0001, Model# HERE00001) be exempt from placing the FCC identification statements, symbols and designated numbers on the electronic earbuds (radio emitting electronic device) due to the inability to add the required information without compromising readability and design intent according to FCC rules Title 47 CFR 15.19 (a)(5). We propose that the required information instead be added to the protective charging case which accompanies the earbuds, for the following reasons:

- The ear buds (model #HERE00001) are unique to the protective charging case. The ear buds cannot function without being charged by this specific protective charging case once power is depleted.
- The protective charging case is unique and will only charge the ear buds (model# HERE00001) described in the FCC ID above. It is designed to accompany the earbuds throughout the product lifecycle and is a suitable alternative location to add the FCC ID.
- Size and design of the earbud does not allow for legible FCC marking requirements as described in the KDB publication 784784 D01, Section 2.2 with the minimum font being 4 points (1.4mm high).

Specifics of this Device:

- Overall size of the unit is 20.9mm x 18.4mm x 19.1mm (see appendix A). This overall size is already challenging to include a 10 digit, 12mm long identifier.
- Only flat surface on device is on the bottom side of the devices and is not physically large enough for the required FCC identifier. (see appendix B)
- The top surface, while potentially large enough to contain the FCC identifier (because of size and curvature), is a critical cosmetic surface and visible when worn. Placing the FCC identifier in this location would significantly distract from the design and company branding. (see Appendix C)
- Neither the side, nor the back surfaces would support the 10-character FCC identifier string, even if printed at the minimum 4pt font. A string of 10 characters would span 12mm and would not fit on on these surfaces (due to curvature related distortion it would cause with the laser etched artwork). (see Appendix C)

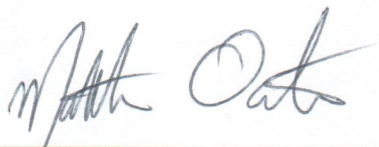
- The charging case is an ideal carrier of the FCC ID number due to its large flat surface and necessity to accompany the earbuds as described above. (see also Appendix D)

Conclusion

Based on the forgoing, we have concluded that this device is too small (due to size and design curvature) to support the legibility required for the FCC Identifier on any surface.

Please contact me at (503) 451-3311 if you require any additional information.

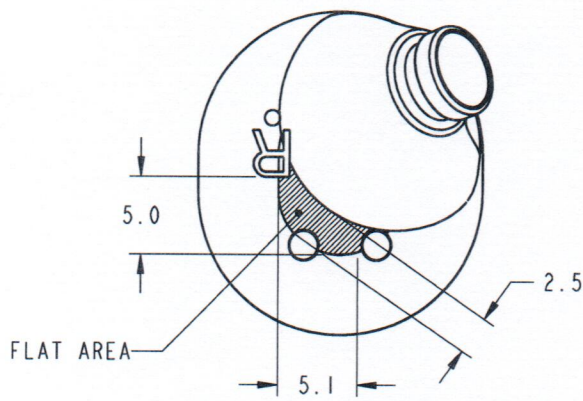
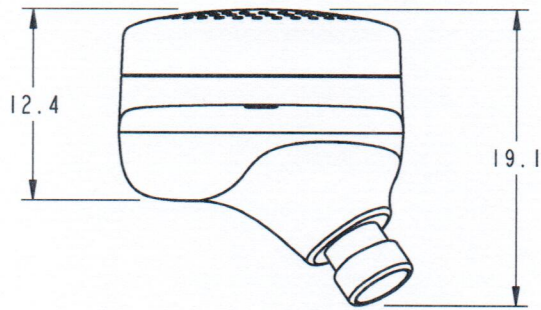
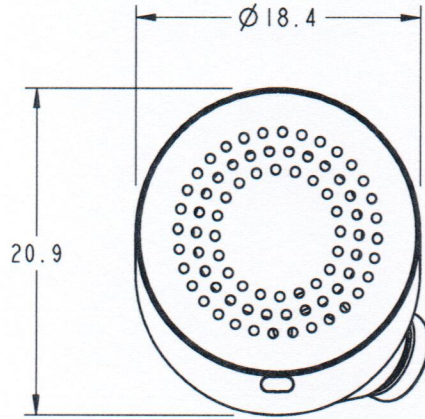
Regards,



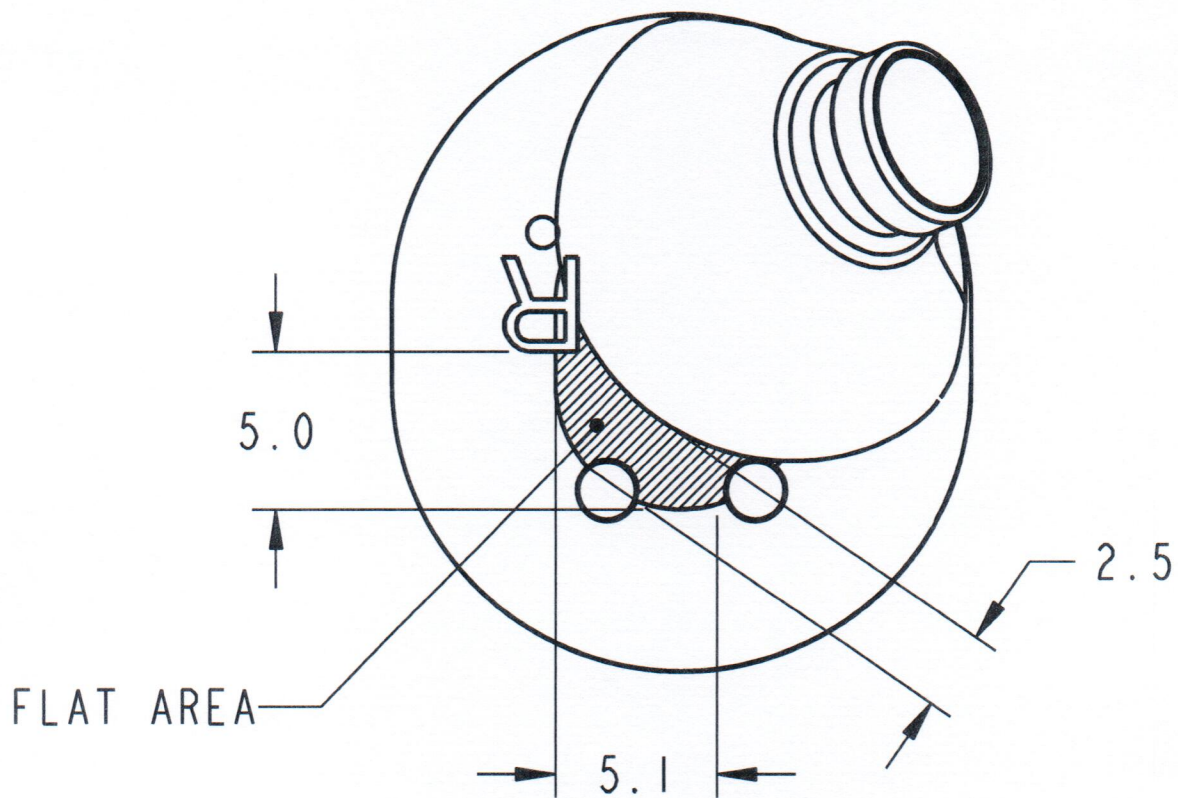
1/28/16

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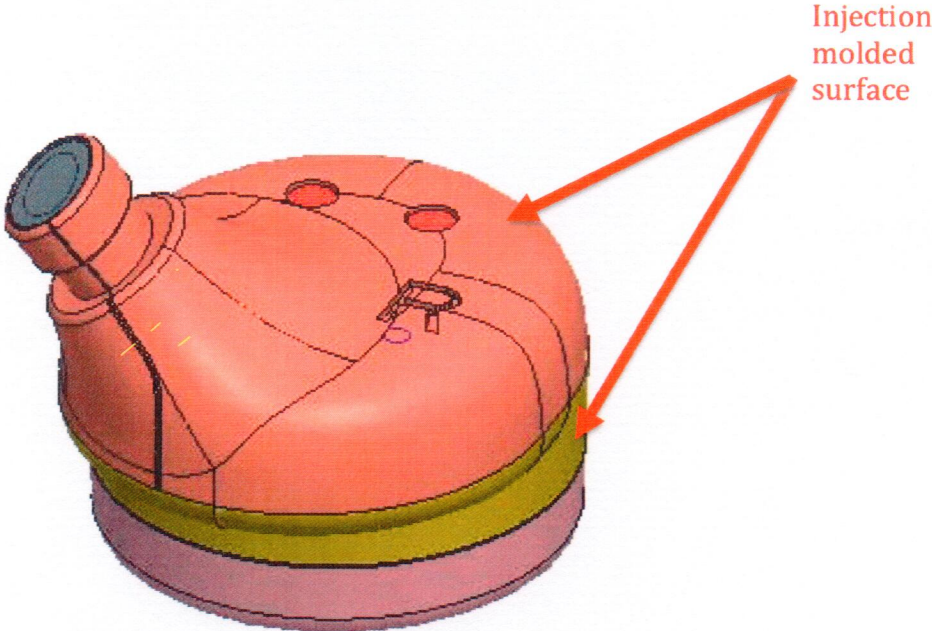
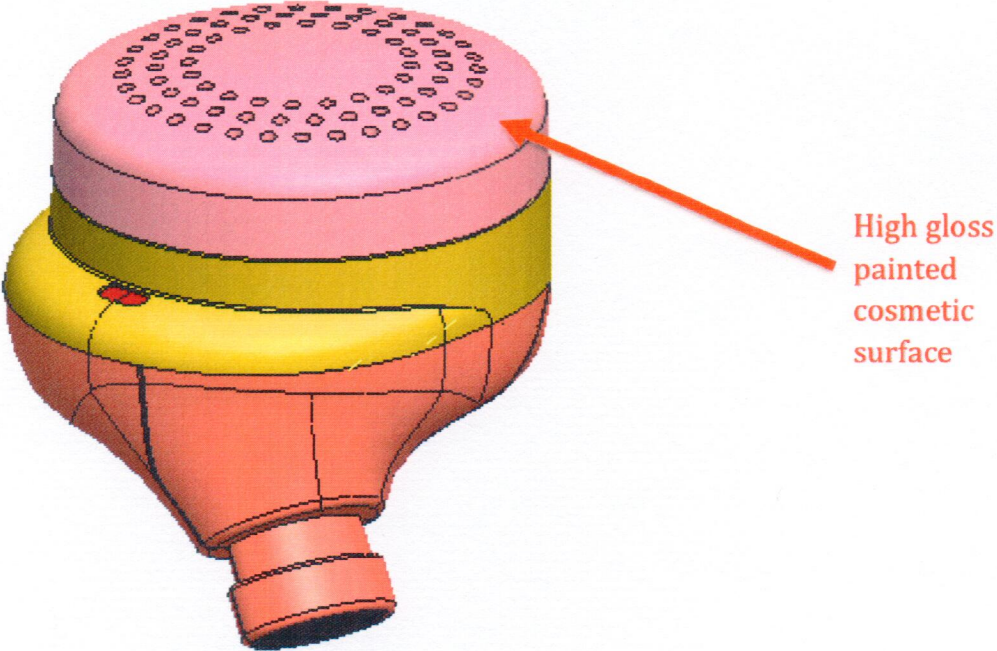
Appendix A



Appendix B

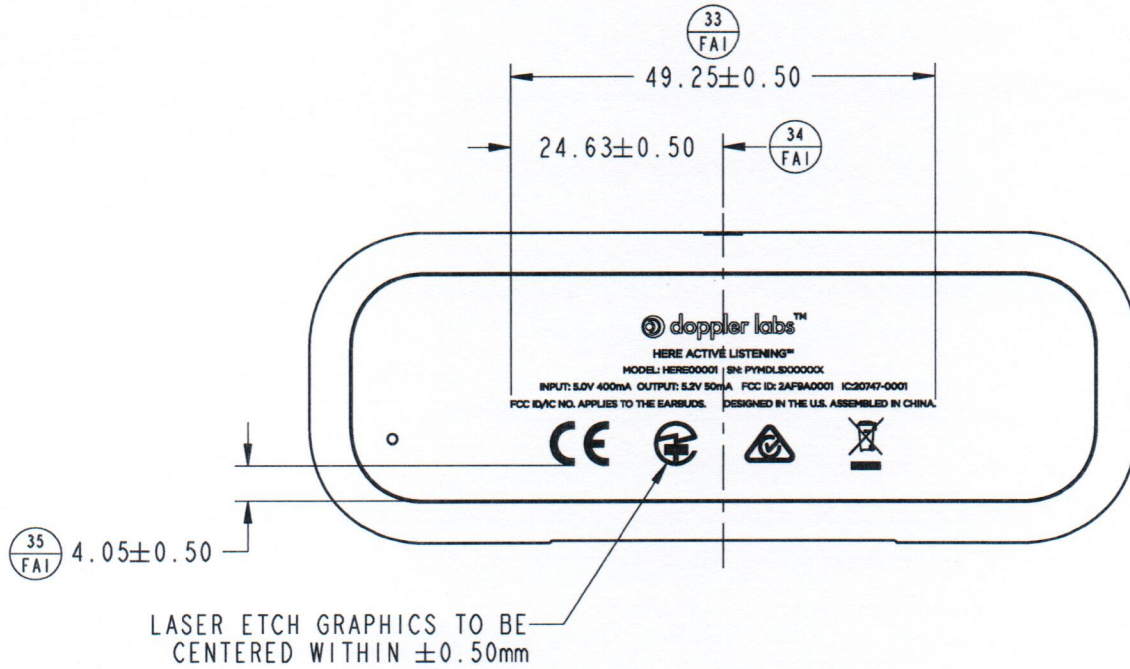


Appendix C



Appendix D

Protective Charging Case – Bottom View



GRAPHICS LOCATION DETAIL