



4045-A Campbell Ave.
Menlo Park, CA 94025

3/12/2019

Attention: Application Examiner

RE: Request for Labeling and FCC ID display exemption
Applicant: Earlens Corporation
FCC ID: 2AGDU-EL2PIN

To Whom It May Concern:

Request is hereby submitted by Earlens Corporation to exempt the Audio Processor device for the referenced FCC identifier from requirements pertaining to including a label and displaying the FCC identifier on the device itself (Section 2.925, Section 2.926) Earlens Corporation, would like to include the FCC identifier for the device in the associated User Manual only.

Rationale for request for exemption:

- The top cover and the bottom housing of the device are removable using fingernails (i.e. no special tools). See attached photo of disassembled device with bottom housing on the left, electronics assembly in the center and top cover on the right.
- Because the housing is removable it does not meet requirements as required per 784748 D01 Labelling Part 15 & 18 Guidelines, Section 4. Label Location for Part 15 and 18 Devices and we are unable to print FCC ID on these removable surfaces.
- We believe the products referenced below constitute a precedent to our request.
 - Resound X26BE70
 - Starkey EOA-IRIS-HA

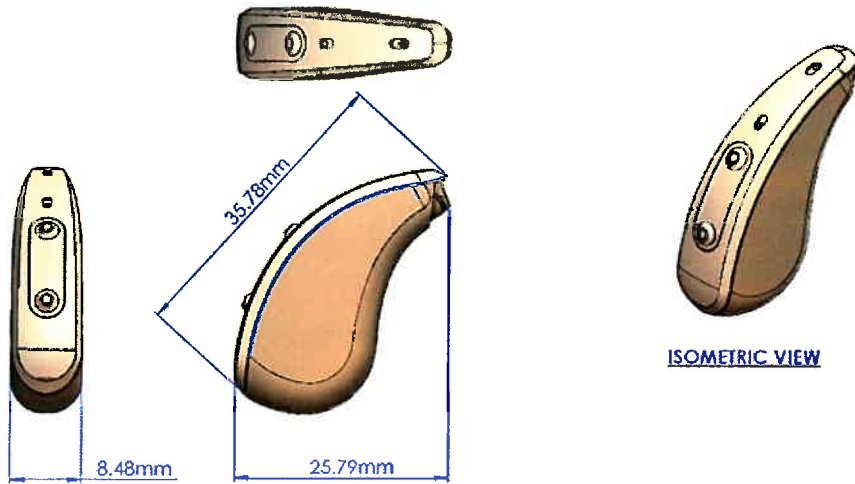
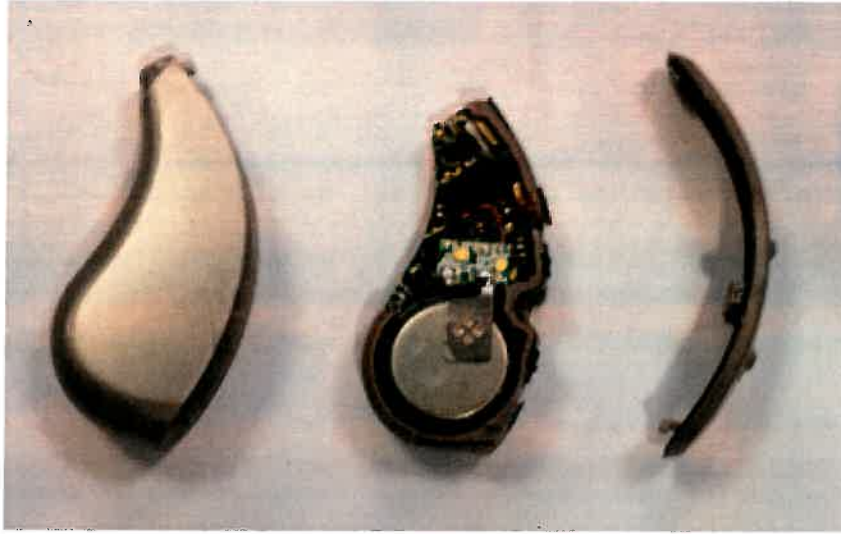
In support of our argument please refer to attached drawings.

If you have questions or need further information, please contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read "Greg Koskowich".

Greg Koskowich
VP, R&D Sound Processing
Earlens Corporation



Drawing Title Drawing No. Drawing Date Drawing Scale Drawing Author Drawing Checker Drawing Approver	Part Name Part No. Part Description Part Material Part Finish Part Weight Part Volume Part Length Part Width Part Height	Drawing No. Drawing Date Drawing Scale Drawing Author Drawing Checker Drawing Approver	Drawing Title Drawing No. Drawing Date Drawing Scale Drawing Author Drawing Checker Drawing Approver	earlens EARLENS CO. 4045-A CAMPBELL AVE. MENLO PARK, CA 94025
Drawing Title Drawing No. Drawing Date Drawing Scale Drawing Author Drawing Checker Drawing Approver	Part Name Part No. Part Description Part Material Part Finish Part Weight Part Volume Part Length Part Width Part Height	Drawing No. Drawing Date Drawing Scale Drawing Author Drawing Checker Drawing Approver	Drawing Title Drawing No. Drawing Date Drawing Scale Drawing Author Drawing Checker Drawing Approver	Drawing Title Drawing No. Drawing Date Drawing Scale Drawing Author Drawing Checker Drawing Approver