

Federal Communications Commission  
Equipment Authorization Branch  
7435 Oakland Mills Road  
Columbia, MD 21046

7/19/2018

### **Electronic Labelling Statement acc. to KDB 784748 D02 e labelling v01**

**Company name:** Luke Roberts GmbH  
**FCC ID:** 2AP5D01LR  
**FCC Part 15 Certification**

To whom it may concern:

## **II. GUIDANCE FOR DEVICES WITH INTEGRATED SCREEN USING E-LABEL**

### **A. Information to be displayed**

1. The FCC ID and/or the Declaration of Conformity (DoC) logo (if applicable).
2. Any other information required by specific rule to be provided on the surface of the product unless such information is permitted to be included in the User's manual or other packaging inserts.

### **B. Access to the required information on the e-label**

1. Users must be able to access the information without requiring special access codes or permissions and, in all cases the information must be accessible in no more than three steps in a device's menu.
2. Devices must not require special accessories or supplemental plug-ins (e.g., the installation of a SIM/USIM card) to access the information.
3. Users must be provided specific instructions on how to access the information. The instructions must be included in the User's manual, operating instructions, insert in the packaging materials, or other similar means. Alternately, the access information may be available on the product related website with instructions on how to access the website provided in the packaging material.
4. The equipment authorization application for the device must clearly include the instructions for accessing information as part of the exhibit showing the label information.

### **C. Labeling for Importation and Purchasing**

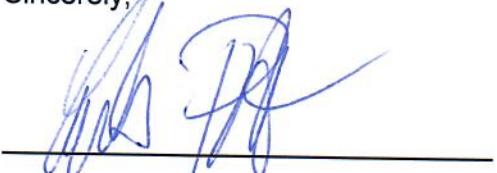
Products utilizing e-labels are required to have a physical label on the product at the time of importation, marketing and sales. For devices imported in bulk and not packaged individually, a removable adhesive label or, for devices in protective bags, a label on the bags is acceptable for this purpose. Any removable label shall be of a type intended to survive normal shipping and handling and must only be removed by the customer after purchase. For devices imported already in individual packages ready for sale, the information may alternatively be provided on the package. It shall contain:

1. The FCC ID and/or the DoC logo (if applicable); and
2. Any other information required by specific rule to be provided on the surface of the product unless such information is permitted to be included in the User's manual or other packaging inserts.

### **D. Other considerations**

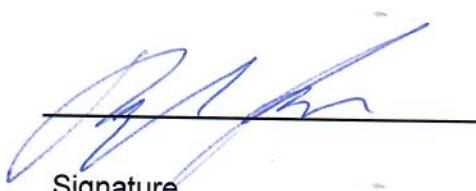
1. The above information must be programmed by the responsible party and the information must be secured in such a manner that third-parties cannot modify it.
2. All the applicable regulatory information required on the packaging or user instructions must be provided according to the rules even if it is displayed electronically. For example, hearing aid compatibility (HAC) ratings for the phones as specified in 47 C.F.R. § 20.19.
3. E-label displays may include regulatory information required to be placed in the User's Manual or on the packaging as required by the rules. The following considerations must be taken into account for such information distribution.
  - a. If the primary user manual or user guide is provided by other electronic media (e.g., CD, or online access) then as an option this information can also be provided as part of the e-label.
  - b. The e-label format must clearly differentiate between the information required to be on the surface of the product and the information required for the User's Manual or on the packaging.
4. Products subject to both certification and Declaration of Conformity or certification and Verification can use the e-label guidance by displaying both the FCC ID and an image of the FCC DoC Logo, or FCC ID and product identification as required by the rules.

Sincerely,



Signature

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