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Federal Communications Commission TCB

Re:application for **FCC ID**: BCE-OTE25 - Jabra OTE25 *Bluetooth*[®] Headset

Justification for placing the FCC identifier for Jabra OTE25 in the associated User Guide

GN Netcom hereby submit justification for placing the FCC ID in the users manual rather than on the radio part of the device.

FCC rules (47CFR2.915(d)) requires an applicant to permanently label a product with the assigned FCC ID:

“Where it is shown that a permanently affixed nameplate is not desirable or it is not feasible, an alternative method of positively identifying the equipment may be used....”

Also, this rule (47CFR2.925(a)(2)) requires that “any other statements or labelling requirements imposed by the rules governing the operation of the specific class of equipment” must appear on the device. As this device is being authorized under part 15 via certification, per (15.19(a)(3)) the following text is required:

“ This device complies with part 15 of the FC 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 FCC acknowledges that these requirements are subject to practical considerations. §15.19(a)(5) allows the above text to be moved to the user guide in the event that “the device is so small that it is not practicable” to label the device itself. Similarly, the FCC has provided guidance (KDB publication 784748 D01, sec 2.2) which allows for the FCC identifier to be moved to the Users Manual in the event that the device is too small for the FCC ID to be readable (smaller than 4-6 points). The FCC does not require that an inquiry to be submitted prior to grant issuance in these matters.

The surfaces of Jabra OTE25 Bluetooth® Headset is mainly made of soft rubber material which is not amendable to laser edging and pad printing would not be sufficiently permanent as required by the rules.

Marking on top surface would ruin the product design in a way so that the product would not be attractive to customers.

The headset consist of the radio part and the charging part which per definition is regarded as a combined system. As the radio part can only operate approx. 2 hours before charging is needed, the two parts are un-separable for operation of the product.

The headset cannot be charged by other means. Also the headset can only be paired up to a mobile phone while docked into the charger part.

Based on the foregoing we have concluded that the device is unquestionable too small and too curved, given the specifics of the design, materials and marking technologies, to support a legibly printed FCC identifier. Therefore it is appropriate to move the FCC identifier to the Users Manual



Ballerup Denmark

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(Place)

2015-07-31

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(Date)

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