



Date: August 10, 2011

Federal Communications Commission  
Office of Engineering and Technology Laboratory Division  
7435 Oakland Mills Rd.  
Columbia MD 21046

Subject: Class II permissive change – HAC Compliance FCC CFR Title 47 Section 20.19

FCC ID: BCG-E2380A and BCG-E2380B

To whom it may concern:

Apple Inc. offers no more than two digital wireless handset models per air interface, therefore, Apple Inc. qualifies under the FCC's "de minimis exception" (47 C.F.R. 20.19(e)) and may meet hearing aid compatibility requirements by providing a user-selectable option that reduces maximum power by no more than 2.5 decibels (except for emergency calls to 911) for GSM operations in the 1900 MHz band (47 C.F.R. 20.19(e)(iii)).

#### **Hearing Aid Mode**

iPhone 4 (FCC ID: BCG-E2380A and BCG-E2380B ) GSM has a Hearing Aid Mode that, when activated, may reduce interference with some hearing aid models. To activate Hearing Aid Mode, go to Settings > General > Accessibility.

When the Hearing Aid Mode switch is set to ON, there is no reduction of the maximum transmit power for emergency 911 calls.

The two variants of Apple's iPhone 4, model A1332, are identical in electrical and mechanical design and the only difference is that the WiFi / Bluetooth module is made by two different vendors. The module is a component soldered to the main printed circuit board. The cellular circuits and components are part of the main printed circuit board and remain the same for both variants of the WiFi / Bluetooth module. This difference between the variants has no impact on the HAC RF/T-Coil measurements thus all the HAC tests were performed only on FCC ID: BCG-E2380A variant.

Sincerely,

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