



Date: September 1, 2011

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

Subject: Class II permissive change – Adding 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)).

Both FCC ID BCG-E2380A and BCG-E2380B are marketed and sold as one model "Apple's iPhone 4, Model A1332" and are identical in electrical and mechanical form and features. The main cellular printed board is the same for both FCC IDs. The only difference between BCG-E2380A and BCG-E2380B is that each uses a different WiFi / Bluetooth sub-assembly module that is soldered to the main cellular printed board.

Apple has evaluated both BCG-E2380A and BCG-E2380B and determined that there is no difference in the HAC RF/T-Coil measurements between both FCC IDs. Therefore, the HAC exhibits in the respective applications are the same for both FCC IDs.



Hearing Aid Mode

iPhone 4, Model A1332 GSM has a Hearing Aid Mode to 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)).

The user-selectable switch to activate Hearing Aid Mode is located at Settings > General > Accessibility.

Apple will provide the appropriate disclosure statements to end users for both: 1) HAC-rated handsets that operate with voice capability over both C63.19-2007 defined and non-defined air interfaces/bands per 47 C.F.R. § 20.19(f)(2), and 2) HAC-rated handsets that operate over the GSM air interface in the 1900 MHz Band with a user-selectable mode for reducing power under 47 C.F.R. § 20.19(c)(1), per 47 C.F.R. § 20.19(f)(3).

Sincerely,

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