

Inquiry on 06/19/2019:

Inquiry:

Hello OET staff,

We are seeking your approval regarding the FCC ID re-labeling strategy associated with the Change of FCC ID process when integrating FCC certified RF modules in our (Microsoft) host devices.

Please see the attached documents for more details on the proposed FCCID labeling option.

Thank you,

Chaitrali Limaye(chlimaye@microsoft.com)

Vishwas Narayan(vivarada@microsoft.com)

FCC response on 06/21/2019

We would like to determine if the host products could use e-labelling where a described wording could be used.

“Contains: FCC ID: XYZ-123456 as a change of ID to FCC ID:ABC-123456”

This device complies.... etc.

---Reply from Customer on 06/25/2019---

“Yes, the host products can use e-labeling, as they have integrated displays and we can abide by the FCC’s e-labeling requirements per the [KDB784748 D02 e-labeling v02](#)”

FCC response on 06/26/2019

Great, we find this acceptable. Since a host can use e-labeling for a module to read the correct id of the change in ID and associate the original FCC ID of the physical label inside the host as a change in ID will eliminate confusion and is a reasonable notification.

---Reply from Customer on 06/28/2019---

Thank you for your acceptance.

To clarify and finalize our plan in accordance with your guidance:

- The module inside the device will continue to have the original FCCID from module vendor. We will not re-label the module physically with the new (changed) FCCID.
- At a System Level our host device would be e-labeled with:
 - "Contains: FCC ID: XYZ-123456 as a change of ID to FCC ID:ABC-123456”
 - This device complies...etc.

- Our Change of FCCID and C2PC Grants would say "FCC ID: XYZ-123456 as a change of ID to FCC ID: ABC-123456"

Could you please clarify what you mean by "Since a host can use e-labeling for a module to read the correct id of the change in ID..."? Our intent is to retain the original FCCID on the existing physical label on the module. However, the module will be completely concealed within our host device.

FCC response on 06/28/2019

FCC response on 07/01/2019

Everything you say is correct:

- The module inside the device will continue to have the original FCCID from module vendor. We will not re-label the module physically with the new (changed) FCCID.
- At a System Level our host device would be **e-labeled with:**
 - "Contains: FCC ID: XYZ-123456 as a change of ID to FCC ID:ABC-123456"
 - This device complies...etc. Statement...15.19

The following would be controlled by the FCC's EAS system through the TCB and when you file as a Change in ID and then file a Class II permissive change. This is not something you need to add or make comments on the Grant. The grant for the change in ID will be issued with all the privileges of the original grant. The public record of the 731 applications will indicate that it is a Change in ID.

- Our Change of FCCID and C2PC Grants would say "FCC ID: XYZ-123456 as a change of ID to FCC ID: ABC-123456"

Everything you say is correct:

- The module inside the device will continue to have the original FCCID from module vendor. We will not re-label the module physically with the new (changed) FCCID.
- At a System Level our host device would be **e-labeled with:**
 - "Contains: FCC ID: XYZ-123456 as a change of ID to FCC ID:ABC-123456"
 - This device complies...etc. Statement...15.19

The (Third bullet) would be controlled by the FCC's EAS system through the TCB when you file as a Change in ID and then file a Class II permissive change. This is not something you need to add or make comments on the Grant. The grant for the change in ID will be issued with all the privileges of the original grant. The public record of the 731 applications will indicate that it is a Change in ID. Our Change of FCCID and C2PC Grants would say "FCC ID: XYZ-123456 as a change of ID to FCC ID: ABC-123456"

---Reply from Customer on 12/09/2019---

Hello FCC,
We have a follow-on question to this inquiry.

We will create a (new) generic Microsoft FCC ID (e.g., XYZ-789) for the module through the Change of ID process.

This module will go inside a host that implements proximity sensor-based power reduction mechanism and therefore will need a unique FCC ID (e.g., XYZ-123456) (again, through Change of ID process).

Can we now e-label the host device as "Contains XYZ-123456 as a Change of ID to FCC ID: XYZ-789"? Or does the label need to show the original FCC ID from module vendor (ABC-123456)?

In short, which of the following three options can we use?
Contains XYZ-123456 as a Change of ID to FCC ID: XYZ-789
Contains XYZ-123456 as a Change of ID to FCC ID: ABC-123456
Contains XYZ-123456 as a Change of ID to FCC ID: XYZ-789 / ABC-123456

Thank you,
Chaitrali Limaye
Vishwas Narayan

FCC response on 12/09/2019

It is difficult to follow, and some clarification is required. Explain the Host, how many modules are in the host and their relationship and what is the label on the internal modules. I am confused by the examples.

HOST A contains module FCC ID XYZ-123456 which is change in ID of FCC ID XYZ-789 which is a change in ID of FCC ID 3. Module FCC ID ABC-123456 is labeled with FCC ID ABC-123456.

If this is correct, why can't you just use FCC ID XYZ-789. I may be confused.

---Reply from Customer on 12/10/2019---

Apologies for not providing enough clarification. Please see the document attached to this inquiry. It contains a simple flowchart and some details for the question.

Thanks,
Chaitrali Limaye

---Reply from Customer on 12/10/2019---

Apologies for not providing enough clarification. Please see the attachment for a simple flowchart explaining the different IDs and the details.

FCC response on 12/11/2019

What is the reason that FCC ID XYZ -12345 cannot be a change in ID to ABC -12345. Both XYZ -78 and XYZ -123456 are the same device as ABC -12345.

The public record would be less confusing, also what did the letter from ABC say, Permission to do a change in ID or specifically to allow a change in ID for XYZ -789.

---Reply from Customer on 12/11/2019---

We are creating XYZ-789 as an intermediate ID as the 'base' to create new IDs like XYZ-123456 that will go inside host devices with different antenna/sensor configurations. The base ID is being created because we want a Microsoft ID as the base and avoid multiple letter requests to ABC.

In short, yes, XYZ-789 and XYZ-123456 are the same RF module as ABC-12345. The difference is that XYZ-789 is an exact copy of original module whereas XYZ-123456 will be tied to a specific host device (after adding SAR backoff details via C2PC).

Letter from ABC says permission to allow change in ID for XYZ-789. The plans for future change in IDs are not disclosed to ABC.

Thanks,
Chaitrali Limaye

---Reply from Customer on 12/11/2019---

Intermediate ID XYZ-789 is being created because we want a Microsoft ID as the 'base' for creating new IDs like XYZ-123456 (to be used in different hosts with different antenna/sensor configs). This is also to avoid multiple letter requests to ABC for multiple new IDs.

The letter from ABC says permission to allow change in ID for XYZ-789. The plan for future change in ID is not disclosed to ABC.

Can we use the labeling scheme as "Contains FCC ID XYZ-123456 as change in ID to FCC ID XYZ-789"?

Thanks,
Chaitrali Limaye

---Reply from Customer on 12/12/2019---

Hello FCC,
Can you please advise if we can use the labeling scheme referencing MSFT ID XYZ-789?

Thanks,
Chaitrali Limaye

FCC response on 12/16/2019

This request can be complicated because of two KDB policies.

First is KDN 616217 D04 SAR for laptop and tablets v01r02 requiring a separate FCC ID for each tablet with different sensor and antenna configurations.

Second the change in ID policy Publication Number: 249634 requiring a signed permission letter from the original grantee Party B, on Party Bs letterhead, giving permission to file the change in ID(s), and listing all the applicable FCC IDs and the dates of the original grants of equipment authorization.

Basically, if you did do a change in ID to XYZ-123456 to a new ID to FCC ID XYZ-789 you still need an original permission letter from the original Grantee granting permission for this specific arrangement. Which would be basically the same as doing an original Change in ID - FCC ID XYZ-789 as a change of ID from FCC ID:ABC-123456”

The interpretation in Publication Number: 249634 was not to isolate permission from the original Grantee through a change in ID to yourself. Youi still need permission form the original grantee.

Originally, for the previous Host, you did a change in ID XYZ-123456 form Grantee’s ABC-123456” but could not relabel the actual module, so we said you could label: “Contains: FCC ID: XYZ-123456 as a change of ID to FCC ID:ABC-123456”

Now you want a new Change in ID because of 616217 D04 as FCC ID XYZ-789 and you can use the same strategy:

“Contains: FCC ID: XYZ-789 as a change of ID to FCC ID: XYZ-123456” or if you do the change in ID to FCC ID:ABC-123456 instead. Them “Contains: FCC ID: XYZ-789 asa change of ID to FCC ID:ABC-123456”

You can call me 301 362 3051 since I still may not be totally clear.

---Reply from Customer on 12/16/2019---

Thank you for the response. To summarize my understanding, in the label for XYZ-789 host, we can reference the previous Microsoft FCC ID (XYZ-123456), after obtaining the specific approval letter from module vendor for this 2nd Change of ID.

Thanks,
Chaitrali Limaye

FCC response on 12/17/2019**FCC response on 12/17/2019**

I assume that

Yes, the label for XYZ-789 host, can reference the previous Microsoft FCC ID (XYZ-123456), after obtaining the specific approval letter from module vendor for this 2nd Change of ID.

To Reiterate

FCC ID XYZ-789 as a Module will be certified as a Change in ID which you will point to as a change in ID of XYZ-123456, with permission from original Grantee ABC -123456. We would want, for the filing, a new approval letter for XYZ-789 as a change in ID for XYZ-123456 . Then it would be acceptable to say

“Contains: FCC ID: XYZ-789 as a change of ID to FCC ID:XYZ-123456”

But note that if you wanted to you could also get a new approval letter for XYZ-789 as a change in ID for ABC-123456. This would also be acceptable.

Which then the label can be “Contains: FCC ID: XYZ-789 as a change ofID to FCC ID: ABC-123456”

If I do not have it correctly give me a call.

---Reply from Customer on 02/24/2023---

Hello FCC,

We have a follow-up question to FCC's response on 7/1/2019. Is the same guidance applicable to physical labels also?

- At a System Level our host device would be labeled with:
 - "Contains: FCC ID: XYZ-123456 as a change of ID to FCC ID:ABC-123456”
 - This device complies...etc. Statement...15.19

Thanks.

FCC response on 03/02/2023

I assume that this is because the module cannot be relabeled. If so, it is acceptable

--Reply from Customer on 03/02/2023---

Yes, the alternate physical labeling proposed above is because the module cannot be relabeled. Thanks for the confirmation.

FCC response on 03/02/2023

Thank you for asking.