

**From:**

Williams Sound Corp.  
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**To:**

Timco Engineering Inc., TCB and FCB  
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July 2, 2008

SUBJECT: WILLIAMS SOUND CORPORATION - FCC ID: CNMT36

REFERENCE: JOB 1086AUT8

Dear Timco Engineering:

The following letter is in regards to the application question from Timco Engineering JOB 1086AUT8 testing for the Williams Sound Corp. T36 transmitter. The question presented in the Timco Engineering letter is as follows:

1. LABEL LOCATION: The label location is not acceptable. It cannot be placed on a battery door and any part of the device that can be removed or lost. Please submit a revised label location. Please refer to Section 2.925(d)(1) – it states “...permanently marked on a permanently attached part of the equipment enclosure.”

The Williams Sound Corp. T36 design group has reviewed the FCC requirements listed in FCC Section 2.925(d)(1). The T36 transmitter has the following characteristics which are applicable to the label location, adhering, and permanence:

1. As previously defined in item number 3 of the document “T36 changes made from Timco units to production.doc” contained in the package “T36 Testing Doc Package Update 06-06-08.zip” sent to [rita@timcoengr.com](mailto:rita@timcoengr.com) on Fri, 06 Jun 2008, the case on the T36 test unit sent to Timco was secured with a rubber band to assist in adjustments needed during testing; the production version of the T36 transmitter will be permanently encased and secured with 4 screws.
2. The battery door on the T36 transmitter can not be removed (or “lost”) without destroying the plastic hinges on the case or altering the case screws which is in direct violation of the Williams Sound Corp. T36 product use and warranty. As

- Williams Sound Corp. would interpret FCC Section 2.925(d)(1), this would comply with the FCC statements "...the required nameplate data is... permanently marked on a permanently attached part of the equipment enclosure." and "...must be able to last the expected lifetime of the equipment in the environment in which the equipment will be operated and must not be readily detachable."
3. As previously defined in item number 2 of the document "T36 changes made from Timco units to production.doc" contained in the package "T36 Testing Doc Package Update 06-06-08.zip" sent to rita@timcoengr.com on Fri, 06 Jun 2008, the production FCC ID label will be made of velvet textured lexan and permanently adhered with 3M 467 MP, 200MP adhesive to the battery door. As Williams Sound Corp. interprets it, this would also comply with FCC Section 2.925(d)(1) statement "Alternatively, the required information may be permanently marked on a nameplate of metal, plastic, or other material fastened to the equipment enclosure by welding, riveting, etc., or with a permanent adhesive."

Williams Sound Corp. has been using this labeling precedent for over twenty years on our transmitters and receivers, all of which have been granted FCC approval by Timco Engineering and other TCB's. Please let us know what/when changes have occurred recently to FCC Section 2.925(d)(1) which redefined the rules governing the approval of our previous products using the same labeling method.

Due to the reasons and methods listed above, as Williams Sound Corp. interprets FCC Section 2.925(d)(1), Williams Sound Corp. does not believe that there is a violation of the FCC requirements for label location, adhering, and permanence. If this reply does not fully address the question presented by Timco Engineering, and/or there is still a question of violation of this FCC requirement, please provide more information on product specific violation details, compliance, and interpretation of FCC Section 2.925(d)(1).

Thank you for your attention to this matter.

Best Regards,  
Kelly Williams  
Williams Sound Corp. Engineering Dept.