


**Subject:** Response to Inquiry to FCC (Tracking Number 910389) (TCB)


**From:** <oetech@fccsun27w.fcc.gov>

**Date:** 11/25/2013 9:17 AM

**To:** <valbertson@nwemc.com>

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 Office of Engineering and Technology

## Office of Engineering and Technology

### Inquiry on 11/19/2013 :

#### Inquiry:

The applicant Starkey Laboratories Inc is requesting that they be allowed to place the FCC ID label for their device in the User Manual rather than on the device itself, which is a wireless hearing aid. Due to the extremely small size of the device, they believe the ID label would become illegible if they had to reduce the font size small enough to fit on the device

Starkey submitted a similar request a few years ago for FCC ID: EOA-IRIS-HA and the FCC gave them permission to place the label in the manual. They are asking for that same permission for this current application. Attached are photos showing the size of the previous device and label and photos showing the size of the current device and label.

Please let us know if you need additional information.

Thanks.

### FCC response on 11/25/2013

FCC Rule Section §2.925 (f) specifically allows for the FCCID to be placed other than on the device.

Reason stated below:

Where it is shown that a permanently affixed nameplate is not desirable or is not feasible, an alternative method of positively identifying the equipment may be used if approved by the Commission. The proposed alternative method of identification and the justification for its use must be included with the application for equipment authorization.

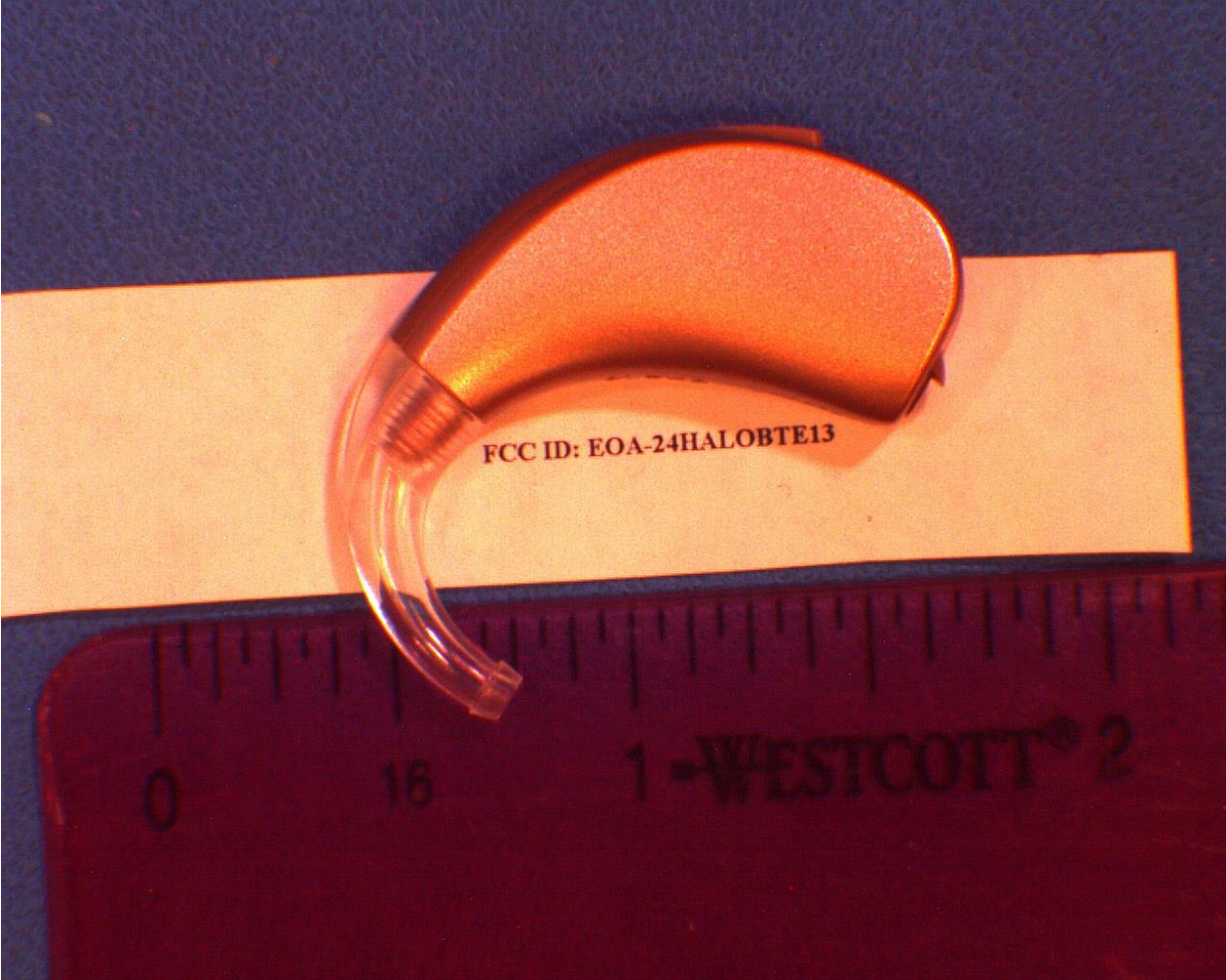
Similarly, KDB 784748 D01 provides guidance that allows the FCCID to be placed in the user's manual.

The FCC approves your request to place the FCC ID in the user's manual. Accordingly, you are allowed to place the FCCID in the user's manual. Please note that the approval of this condition by the FCC must be included in the application for certification.

**Attachment Details:**

[Photos showing sample devices](#)

Do not reply to this message. Please select the [Reply to an Inquiry Response](#) link from the OET Inquiry System to add any additional information pertaining to this inquiry.



FCC ID: EOA-24HALOBTE13

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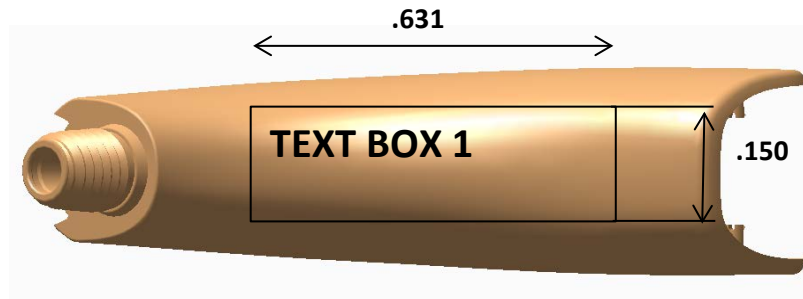
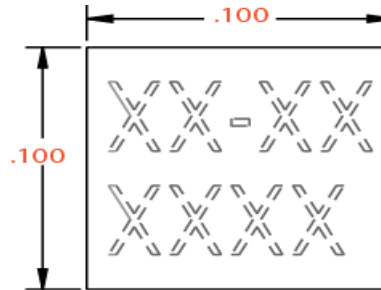
16

1 - WESTCOTT® 2

BASE	TAB	TEXT BOX	LASER PRINTED TEXT	FONT	LOGO ID#
65973	1XX	1	STARKEY	Import File/ See Note 5	
65973	2XX	1	AUDIBEL	Import File/ See Note 5	
65973	4XX	1	NUEAR	Import File/ See Note 5	
65973	7XX	1	PER CUSTOMER REQUEST	Import File/ See Note 5	
65973	8XX	1	MICROTECH	Import File/ See Note 5	
65973	CXX	1	AUDIGY	Import File/ See Note 5	

REVISIONS (ALL SHEETS ARE SAME REV)					
REV	PRO/ECO	CHANGE DESCRIPTION	ENGR	DOC	RLSD DATE
01	MN43308	Eng Release	KK	EG	8/19/2014


Laser Text	Line	Font	#ID
XX-XX	2	Arial	591
XXXX	3	Arial	591



**NOTES:**

1. All dimensions are for Reference Only
2. Dimensions Depic Maximum Character window
3. All Tex to be centered in window
4. Use import CE file for CE, Arial font for 0086
5. Use import file for text box 1
6. Ink colors limited to the Starkey Standard colors
7. Fixture: 22389-000, 22385-000, 21937-000 Laser Fixture

Final Assembly# 6XXXX-XXX  
 Company \_\_\_\_\_  
 Color \_\_\_\_\_

Tolerance unless otherwise specified Inches (MM)			 6700 Washington Ave. South Eden Prairie, MN, 55344 Tel. 952-941-6401 Fax 952-828-9262			
.X	± .015	ANGLES	Title: <b>Jackson 2.4 GHz BTE 13 Label Control Drawing</b>			
.XX	± .010	DEGREES				
.XXX	± .002	± 1.0				
.XXXX	± .001					
By	Signature	Date	Size:	Scale:	Part No:	Rev
DRFT	Cynthia/Carmen	8/5/2014	C	1/1	30325-100	1
CHKD	Gary Zajicek	8/6/2014				
MKTG	Molly Loe	8/15/2014				
QLTY	Jodi Rickheim	8/15/2014				