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Eden Prairie, MN 55344-3404

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4-18-2012

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Subject: FCC ID labeling on EOA- 3SERMINI wireless hearing aid

Re: Response to Inquiry to FCC (Tracking Number 775017)

To whom it may concern,

Consistent with the direction provided in your July 12, 2010 Response to Inquiry to FCC (Tracking Number 775017) concerning approval by the FCC for alternate labeling to our hearing aid under CFR 2.925(f), we are including the following documents with our submission for Certification of Starkey's wireless hearing aid having an FCC ID of EOA- 3SERMINI.

- The FCC Response to Inquiry to FCC (Tracking Number 775017)
- The five supporting documents associated with that Inquiry
 - o Hearing aid label control drawing
 - o Grant of Eq. Authorization for competitive aid
 - o Grant of Eq. Authorization for second competitive aid
 - o Figure 1 showing curved nature and relative size of hearing aid
 - o Figure 2 showing available printable area and FCC ID
- The relevant page from the User Manual showing the alternate FCC ID marking location and other part 15 required wording.

If you have any questions or comments, please do not hesitate to contact me.

Sincerely,

Ken Meyer
Regulatory Manager
Starkey Laboratories, Inc.
952-947-4734
Ken_meyer@starkey.com

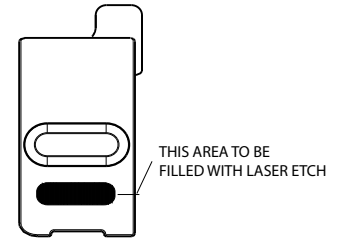
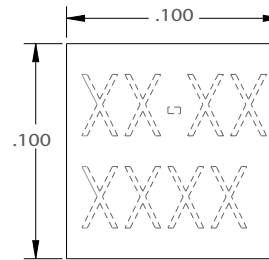
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BASE	TAB	TEXT BOX	PAD PRINTED TEXT	FONT	LOGO ID #
65760 65791 65772 65862	1XX	1	3 series 1110 Starkey	Import File/ See Note 5	17
65760 65791 65772 65862	2XX	1	AUDIBEL PLATINUM wireless	Import File/ See Note 5	56
65760 65791 65772 65862	3XX	1	debut 325w AudioSync	Import File/ See Note 5	45
65760 65791 65772 65862	4XX	1	NUEAR SDS WIRELESS	Import File/ See Note 5	74
65760 65791 65772 65862	5XX	1	Specsavers	Import File/ See Note 5	
65760 65791 65772 65862	7XX	1	PER CUSTOMER REQUEST	Import File/ See Note 5	
65760 65791 65772 65862	8XX	1	propel w50 microtech	Import File/ See Note 5	36
65760 65791 65772 65862	AXX	1	AGX s3si110 AUDIGY GROUP	Import File/ See Note 5	95
65760 65791 65772 65862	CXX	1	Silvertone 50wd	Import File/ See Note 5	10

REVISIONS (ALL SHEETS ARE SAME REV)					
REV	ECO	CHANGE DESCRIPTION	CHG ENGR	DOC	RLSD DATE
01	MN33261	Eng. Release	JL	SW	11/7/11
A	MN34945	Updated to add Pad Printed Text	JL	SW	4/5/12

ORW LABEL MARKING

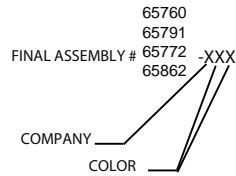
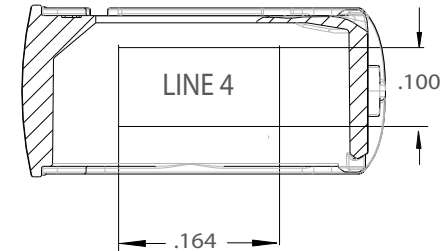
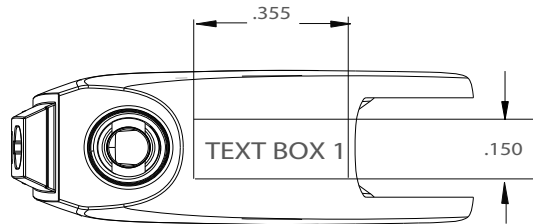
LASER TEXT	LINE	FONT
XX-XX	2	ARIAL
XXXX	3	ARIAL



BATTERY LOCK DETAIL

THIS AREA TO BE FILLED WITH LASER ETCH

LASER TEXT	LINE	FONT
B312d	4	ARIAL



- NOTES:
1. ALL DIMENSIONS ARE FOR REFERENCE ONLY
 2. DIMENSIONS DEPICT MAXIMUM CHARACTER WINDOW
 3. ALL TEXT 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: 21976-000 Diamond Mini BTE laser marking Fixture
 8. Fixture: 21918-000 Diamond 312 RIC Product ID Marking Fixture

TOLERANCE UNLESS OTHERWISE SPECIFIED INCHES (MM)		
.X	± .015	ANGLES
.XX	± .010	DEGREES
.XXX	± .002	± 1.0
.XXXX	± .001	

BY	SIGNATURE	DATE
DRFT	C. Nguyen	10/15/11
CHKD	Del Schubert	10/15/11
MKTG	Kate Simek	4/5/12
QLTY	J. Rickeim	11/7/11

Starkey. 6600 Washington Ave. South
Eden Prairie, MN 55344
tel. (952) 941-6401
www.starkey.com

TITLE: **Diamond Wireless Mini BTE
312 Label Control Drawing**

SIZE: C	PROD CODE:	PART NO: 30284-100	REV: A
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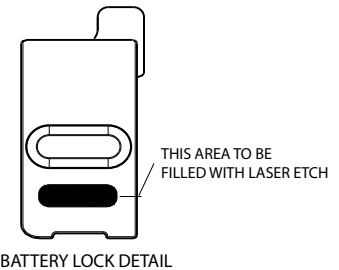
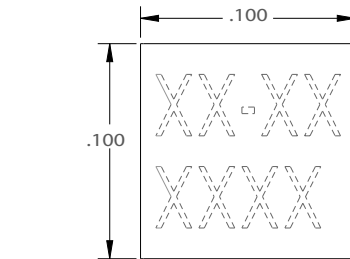
SCALE: 1/1 SHEET: 1 OF 5

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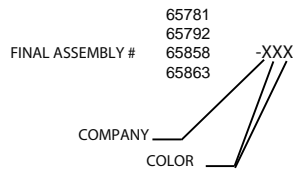
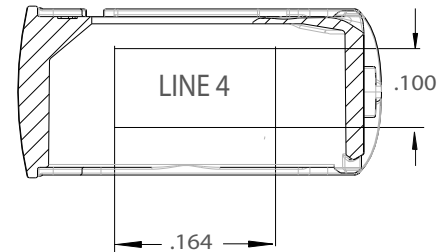
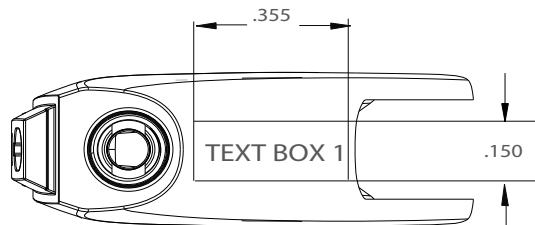
BASE	TAB	TEXT BOX	PAD PRINTED TEXT	FONT	LOGO ID #
65781 65792 65858 65863	1XX	1	3 series i90 Starkey	Import File/ See Note 5	19
65781 65792 65858 65863	2XX	1	AUDIBEL GOLD wireless	Import File/ See Note 5	54
65781 65792 65858 65863	3XX	1	debut 245w AudioSync	Import File/ See Note 5	43
65781 65792 65858 65863	4XX	1	NUEAR SDS PRO WIRELESS	Import File/ See Note 5	78
65781 65792 65858 65863	5XX	1	Specsavers	Import File/ See Note 5	
65781 65792 65858 65863	7XX	1	PER CUSTOMER REQUEST	Import File/ See Note 5	
65781 65792 65858 65863	8XX	1	propel w40 microtech	Import File/ See Note 5	35
65781 65792 65858 65863	AXX	1	AGX s3si90 AUDIGY GROUP	Import File/ See Note 5	97
65781 65792 65858 65863	CXX	1	Silvertone 40wd	Import File/ See Note 5	8

ORW LABEL MARKING

LASER TEXT	LINE	FONT
XX-XX	2	ARIAL
XXXX	3	ARIAL



LASER TEXT	LINE	FONT
B312d	4	ARIAL



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 5. USE IMPORT FILE FOR TEXT BOX 1.
 6. Ink colors limited to the Starkey Standard colors
 7. Fixture: 21976-000 Diamond Mini BTE laser marking Fixture
 8. Fixture: 21918-000 Diamond 312 RIC Product ID Marking Fixture

TITLE: Diamond Wireless Mini BTE 312 Label Control Drawing			
SIZE: C	PROD CODE: 1/1	PART NO: 30284-100	REV: A
SCALE: 1/1		SHEET: 2 OF 5	

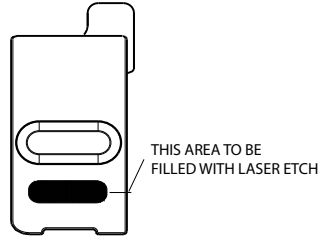
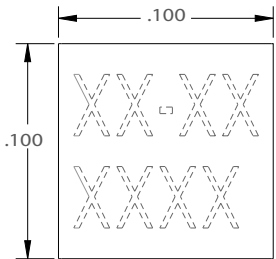
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BASE	TAB	TEXT BOX	PAD PRINTED TEXT	FONT	LOGO ID #
65780 65793 65859 65864	1XX	1	3 series i70 Starkey	Import File/ See Note 5	18
65780 65793 65859 65864	2XX	1	AUDIBEL <i>SILVER wireless</i>	Import File/ See Note 5	58
65780 65793 65859 65864	3XX	1	debut 165w AudioSync	Import File/ See Note 5	41
65780 65793 65859 65864	4XX	1	NUEAR SDS PRESTIGE WIRELESS	Import File/ See Note 5	76
65780 65793 65859 65864	5XX	1	Specsavers	Import File/ See Note 5	
65780 65793 65859 65864	7XX	1	PER CUSTOMER REQUEST	Import File/ See Note 5	
65780 65793 65859 65864	8XX	1	propel w30 microtech	Import File/ See Note 5	34
65780 65793 65859 65864	AXX	1	AGX s3si70 AUDIGY GROUP	Import File/ See Note 5	96
65780 65793 65859 65864	CXX	1	<i>Silvertone</i> 30wd	Import File/ See Note 5	6

ORW LABEL MARKING

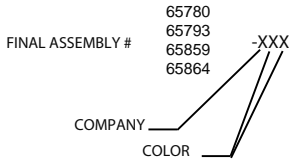
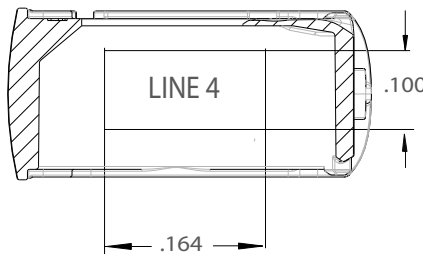
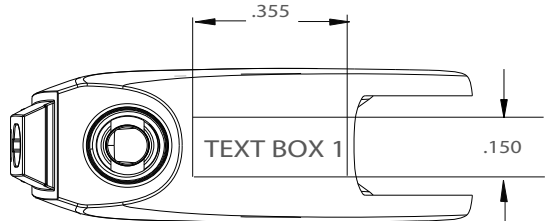
LASER TEXT	LINE	FONT
XX-XX	2	ARIAL
XXXX	3	ARIAL

YEAR



BATTERY LOCK DETAIL

LASER TEXT	LINE	FONT
B312d	4	ARIAL



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 5. USE IMPORT FILE FOR TEXT BOX 1.
 6. Ink colors limited to the Starkey Standard colors
 7. Fixture: 21976-000 Diamond Mini BTE laser marking Fixture
 8. Fixture: 21918-000 Diamond 312 RIC Product ID Marking Fixture

TITLE: Diamond Wireless Mini BTE 312 Label Control Drawing			
SIZE: C	PROD CODE: 1/1	PART NO: 30284-100	REV: A
SCALE: 1/1		SHEET: 3 OF 5	

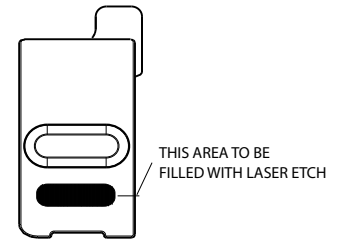
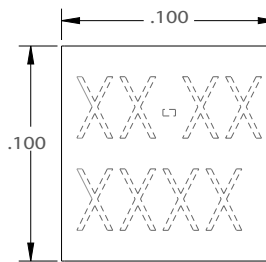
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BASE	TAB	TEXT BOX	PAD PRINTED TEXT	FONT	LOGO ID #
65847 65849 65860 65865	1XX	1	tour i30 Starkey	Import File/ See Note 5	23
65847 65849 65860 65865	2XX	1	START WIRELESS AUDIBEL	Import File/ See Note 5	108
65847 65849 65860 65865	3XX	1	source 95w AudioSync	Import File/ See Note 5	52
65847 65849 65860 65865	4XX	1	INTRO 5 WIRELESS NUEAR	Import File/ See Note 5	69
65847 65849 65860 65865	5XX	1	Specsavers	Import File/ See Note 5	
65847 65849 65860 65865	7XX	1	PER CUSTOMER REQUEST	Import File/ See Note 5	
65847 65849 65860 65865	8XX	1	triumph w20 microtech	Import File/ See Note 5	39
65847 65849 65860 65865	AXX	1	AGX stoi30 AUDIGY GROUP	Import File/ See Note 5	101
65847 65849 65860 65865	CXX	1	Silvertone 20wd	Import File/ See Note 5	4

ORW LABEL MARKING

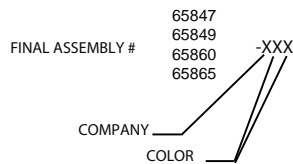
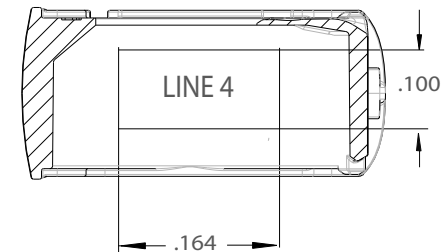
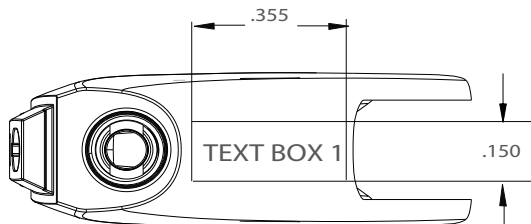
LASER TEXT	LINE	FONT
XX-XX	2	ARIAL
XXXX	3	ARIAL

YEAR



BATTERY LOCK DETAIL

LASER TEXT	LINE	FONT
B312d	4	ARIAL



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 7. Fixture: 21976-000 Diamond Mini BTE laser marking Fixture
 8. Fixture: 21918-000 Diamond 312 RIC Product ID Marking Fixture

TITLE: Diamond Wireless Mini BTE 312 Label Control Drawing			
SIZE: C	PROD CODE: 1/1	PART NO: 30284-100	REV: A
SCALE: 1/1		SHEET: 4 OF 5	

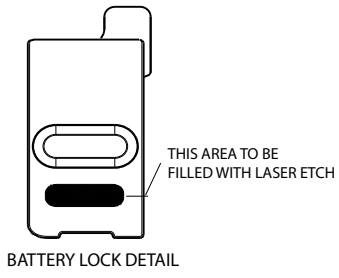
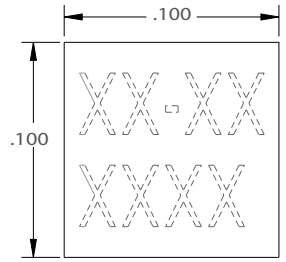
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BASE	TAB	TEXT BOX	PAD PRINTED TEXT	FONT	LOGO ID #
65848 65850 65861 65866	1XX	1	tour 120 Starkey	Import File/ See Note 5	22
65848 65850 65861 65866	2XX	1	START WIRELESS 7 AUDIBEL	Import File/ See Note 5	107
65848 65850 65861 65866	3XX	1	source 85w AudioSync	Import File/ See Note 5	50
65848 65850 65861 65866	4XX	1	INTRO 4 WIRELESS NUEAR	Import File/ See Note 5	67
65848 65850 65861 65866	5XX	1	Specsavers	Import File/ See Note 5	
65848 65850 65861 65866	7XX	1	PER CUSTOMER REQUEST	Import File/ See Note 5	
65848 65850 65861 65866	8XX	1	triumph w10 microtech	Import File/ See Note 5	38
65848 65850 65861 65866	AXX	1	AGX stol20 AUDIGY GROUP	Import File/ See Note 5	100
65848 65850 65861 65866	CXX	1	Silvertone 10wd	Import File/ See Note 5	2

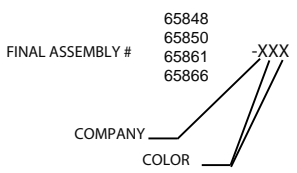
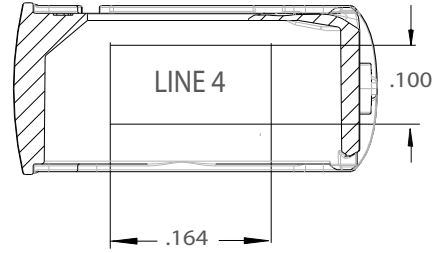
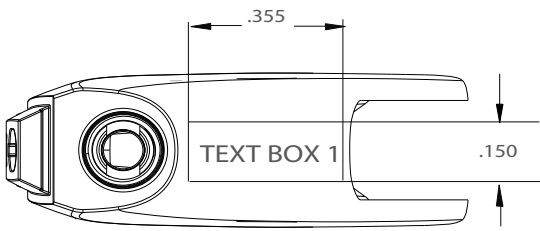
ORW LABEL MARKING

LASER TEXT	LINE	FONT
XX-XX	2	ARIAL
XXXX	3	ARIAL

YEAR →



LASER TEXT	LINE	FONT
B312d	4	ARIAL



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 5. USE IMPORT FILE FOR TEXT BOX 1.
 6. Ink colors limited to the Starkey Standard colors
 7. Fixture: 21976-000 Diamond Mini BTE laser marking Fixture
 8. Fixture: 21918-000 Diamond 312 RIC Product ID Marking Fixture

TITLE: Diamond Wireless Mini BTE 312 Label Control Drawing			
SIZE: C	PROD CODE: 1/1	PART NO: 30284-100	REV: A
SCALE: 1/1		SHEET: 5 OF 5	



Figure 2 showing available printable area (outlined in black) and FCC ID

Ken Meyer

From: oetech@fccsun27w.fcc.gov
Sent: Monday, July 12, 2010 11:58 AM
To: Ken Meyer
Subject: Response to Inquiry to FCC (Tracking Number 775017)



Office of Engineering and Technology

Inquiry:

---Reply from Customer on 07/08/2010---

As stated in the previous response, the lower limit of our printing process is a font size of 4, so the font size can not be reduced. To fit the FCC ID information on the device would require a font size of 2. At a font size of 2, the FCC ID would become an illegible smear, even under magnification.

I understand the importance of the FCC ID being on the device. And I understand the importance of being conservative regarding granting waivers. However, given the extremely small size of our device, this situation seems to be exactly fitting to the intent of 2.925(f).

Response:

We agree your proposal to put the FCC ID in the user manual is consistent with the two precedents you included in your inquiry. You may place the FCC ID in the user's manual in this case since the ID won't fit on the device. Please include a copy of this response with your application package for the TCB grant.

[hearing aid label control drawing](#)

[Grant of Eq Authorization for competitive aid](#)

[Grant of Eq Authorization for a second competitive aid](#)

[Figure 1 showing curved nature and relative size of hearing aid](#)

[Figure 2 showing available printable area and FCC ID](#)

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.