

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.

COPY

FEDERAL COMMUNICATIONS
COMMISSION
WASHINGTON, D.C. 20554

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GRANT OF EQUIPMENT
AUTHORIZATION
Certification

Phonak Inc
4520 Weaver Parkway
Warrenville, IL 60555
United States

Date of Grant: 01/07/2009

Application Dated: 11/27/2008

Attention: Patrick Henry

NOT TRANSFERABLE


EQUIPMENT AUTHORIZATION is hereby issued to the named GRANTEE, and is VALID ONLY for the equipment identified hereon for use under the Commission's Rules and Regulations listed below.

FCC IDENTIFIER: KWC-WHSSAN
Name of Grantee: Phonak Inc
Equipment Class: Part 15 Low Power Communication Device
Transmitter
Notes: Hearing Aid
Modular Type: Does not apply

<u>Grant Notes</u>	<u>FCC Rule Parts</u>	<u>Frequency Range (MHZ)</u>	<u>Output Watts</u>	<u>Frequency Tolerance</u>	<u>Emission Designator</u>
	15C	10.6 - 10.6			

Mail To:
Neviana Nikoloski, Manager Regulatory Affairs & IP
Phonak Communications AG
Laenggasse 17
Murten, CH-3280
Switzerland

EA972615

	Technical Note Phonak Audéo Yes Label Location	Vers.: V1 Page: 1 of 1 Date: 09.12.08
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ID Label / Label Location

Phonak Audéo Yes

Pursuant to paragraph §2.925 of 47 C.F.R. the hearing instrument Audéo Yes, which is subject of this filing, shall bear a permanently affixed, readily visible label listing the information as specified in §2.926 and §15.19(a) of 47 C.F.R. Due to the specific use of the hearing instrument (as shown on Figure 1) its external surface is in a permanent contact with the skin behind the ear. Therefore, it is not appropriate to permanently affix a label on the outer surface of the device in order to prevent any possible skin irritations. The only possible place where the FCC ID and the serial number of the device can be put is the battery compartment as shown on Figure 2. However, in this case the size of the FCC ID will be smaller than 2 points, which does not satisfy the requirements for "readily visible" label as defined in §2.925(d)(2) and §2.925(g).

Therefore, due to the very small size of the device and pursuant to paragraph §15.19(a)(5) of 47 C.F.R., the FCC ID and the statement specified in §15.19(a)(3) are placed in the user manual as shown on Figure 3.

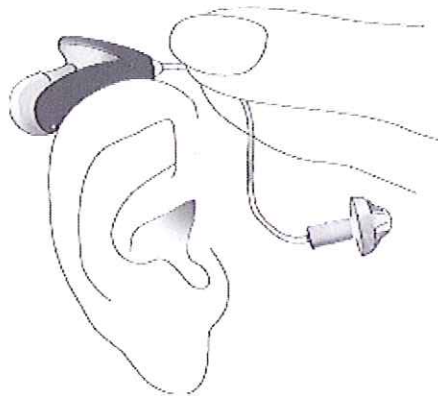


Figure 1: Audéo Yes device positioning

PHONAK life is on	Technical Note Phonak Audéo Yes Label Location	Vers.: V1 Page: 2 of 1 Date: 09.12.08
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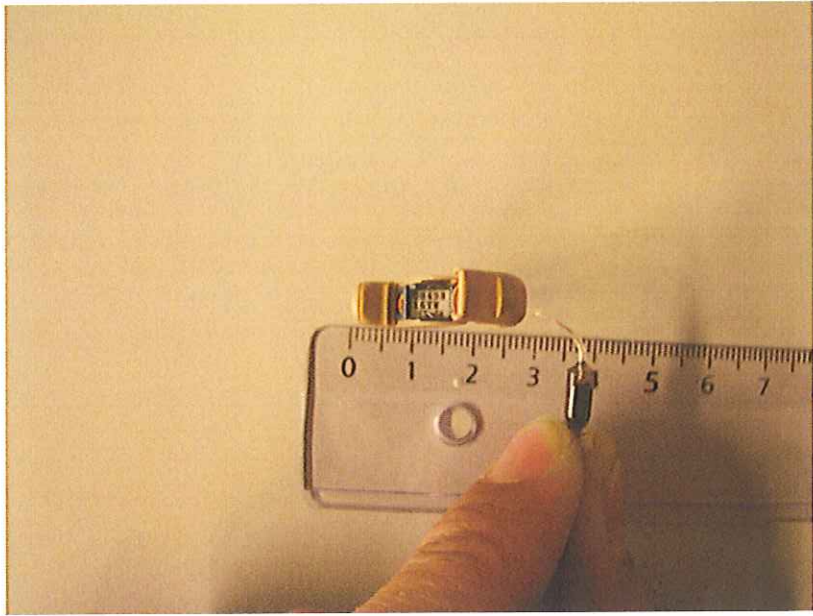




Figure 2: Audéo Yes' battery compartment, current serial number size is 2.2 points

 	Technical Note Phonak Audéo Yes Label Location	Vers.: V1 Page: 3 of 1 Date: 09.12.08
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<p>Notices</p> <p>Notice 1 This instrument is certified under:</p> <p> FCC ID: KWC-WHSSAN IC: 2262A-SAN</p> <p>This device complies with Part 15 of the FCC Rules and with RSS-210 of Industry Canada. Operation is subject to the following two conditions:</p> <ol style="list-style-type: none"> 1) this device may not cause harmful interference, and 2) this device must accept any interference received, including interference that may cause undesired operation. <p>Changes or modifications made to this equipment not expressly approved by Phonak may void the FCC authorization to operate this equipment.</p> <p>Notice 2 This Class B digital apparatus complies with Canadian ICES-003.</p> <p style="text-align: left;">36</p>	<p>Notice 3 This equipment has been tested and found to comply with the limits for a Class B digital device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference in a residential installation. This equipment generates, uses, and can radiate radio frequency energy and, if not installed and used in accordance with the instructions, may cause harmful interference to radio communications. However, there is no guarantee that interference will not occur in a particular installation. If this equipment does cause harmful interference to radio or television reception, which can be determined by turning the equipment off and on, the user is encouraged to try to correct the interference by one or more of the following measures:</p> <ul style="list-style-type: none"> ■ Reorient or relocate the receiving antenna ■ Increase the separation between the equipment and receiver ■ Connect the equipment into an outlet on a circuit different from that to which the receiver is connected ■ Consult the dealer or an experienced radio/TV technician for help <p style="text-align: right;">37</p>
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Figure 3: FCC ID and compliance statement included in the user manual

TCB

**GRANT OF EQUIPMENT
AUTHORIZATION**

TCB

**Certification
Issued Under the Authority of the
Federal Communications Commission
By:**

**TRaC EMC & Safety Ltd
100 Frobisher Business Park Leigh
Sinton Road, Malvern, Worcestershire
Malvern, WR14 1BX
United Kingdom**

**Date of Grant: 04/12/2010
Application Dated: 04/12/2010**

**Widex A/S
Ny Vestergaardsvej 25
Vaerloese, DK 3500
Denmark**

Attention: Ole Gelsbo , Product manager

NOT TRANSFERABLE

EQUIPMENT AUTHORIZATION is hereby issued to the named GRANTEE, and is VALID ONLY for the equipment identified hereon for use under the Commission's Rules and Regulations listed below.

**FCC IDENTIFIER: TTY-C4PA
Name of Grantee: Widex A/S
Equipment Class: Part 15 Low Power Communication Device
Transmitter
Notes: C4-PA Hearing Aid**

<u>Grant Notes</u>	<u>FCC Rule Parts</u>	<u>Frequency Range (MHZ)</u>	<u>Output Watts</u>	<u>Frequency Tolerance</u>	<u>Emission Designator</u>
	15C	10.34 - 10.87			



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100 Frobisher Business Park
Leigh Sinton Road
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WR14 1BX
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Nymoellevej 6
DK-3540 Lyngø
Denmark

Tel.: (+45) 44 35 56 00
Fax: (+45) 44 35 56 01
widex@widex.com
<http://www.widex.com>
CVR. Nr. 1577 1100

Date: April 9th, 2010

FCC Labeling of Widex model C4-PA

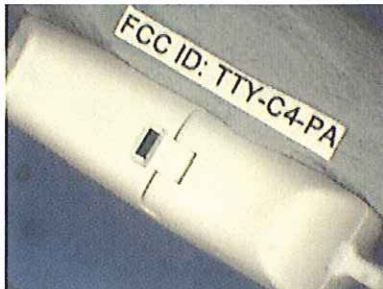
FCC ID: TTY-C4PA

To Whom It May Concern:

The dimensions of the hearing aid are too small to allow the FCC ID to be printed on the device in a font size that is readable. Consequently, the FCC ID is printed in the user instructions together with the FCC regulatory statements.

Justification is provided by 3 photographs below that show the C4-PA in 3 different angles together with a printout of the FCC ID in font size 4 point that is the minimum readable font size as defined in FCC OET Labelling Guidelines.

Bottom view



Side view



Top view



Thank you for your attention to this matter.

Sincerely,
Widex A/S

Hans-Otto Bindeballe