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July 19, 2011

Federal Communications Commission
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, Maryland 21046

Subject: FCC ID: EOA- IRIS - HA

To whom it may concern,

The Opal RIC hearing aid is being offered in additional physical configurations. Starkey is requesting a Class II permissive change to the existing Grant EOA-IRIS-HA to add the following permutations/models to the Grant.

Wi Series RIC 13
Wi Series Custom In-The-Ear (ITE)
Wi Series Custom In-The-Canal (ITC)
Wi Series Custom Completely-In-Canal (CIC)

The additional models have the same core radio circuit and RF characteristics and differ from the original model in the following specific ways:

Wi Series RIC 13

- The flex PCB layout and form factor have been changed to allow fit to a larger case required for higher electro-acoustic output and different user controls.
 - The radio design remains unchanged.
- The antenna layout has not changed type, but has changed physical layout to allow fit to a larger case.
- The antenna is an inductive loop. The loop antenna design employs a resonant capacitor to match the antenna. Due to the change in antenna inductance, the antenna matching capacitor has changed to center the tuning of the antenna.

Wi Series Custom In-The-Ear (ITE)

- The flex PCB layout and form factor have been changed to allow fit to a smaller case required for Custom In-The-Ear (ITE) hearing aids.
 - The radio design remains unchanged from other Starkey wireless hearing aids.
- The antenna design type remains a resonant loop. The physical layout has been adapted to fit into the custom Hearing Aid case.
 - Specifically, it is a single ring antenna vs. a parallel double ring antenna used on the RIC hearing aid design.



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- The antenna is an inductive loop. The loop antenna design employs a resonant capacitor to match the antenna. Due to the change in antenna inductance, the antenna matching capacitor has changed to center the tuning of the antenna.

Wi Series Custom In-The-Canal (ITC)

- The flex PCB layout used in the Custom In-The-Canal (ITC) hearing aid is reused without modification from the Custom In-The-Ear (ITE) hearing aid. The circuitry is reused from the Receiver in the Canal (RIC) hearing aid.
- The antenna design type remains a resonant loop. The physical layout has been adapted to fit into the custom Hearing Aid case.
 - Specifically, it is a single ring antenna vs. a parallel double ring antenna used on the RIC hearing aid design.
- The antenna is an inductive loop. The loop antenna design employs a resonant capacitor to match the antenna. Due to the change in antenna inductance, the antenna matching capacitor has changed to center the tuning of the antenna.

Wi Series Custom Completely-In-Canal (CIC)

- The flex PCB layout and form factor have been changed to allow fit to a smaller case required for Custom Completely-In-Canal (CIC) hearing aids. The circuitry is reused from the Receiver in the Canal (RIC) hearing aid and Custom In-the-Ear (ITE) and Custom In-the-Canal (ITC) hearing aids.
- The antenna design type remains a resonant loop. The physical layout has been adapted to fit into the custom Hearing Aid case.
 - Specifically, it is a single ring antenna vs. a parallel double ring antenna used on the RIC hearing aid design.
- The antenna is an inductive loop. The loop antenna design employs a resonant capacitor to match the antenna. Due to the change in antenna inductance, the antenna matching capacitor has changed to center the tuning of the antenna.

A firmware change will be utilized to extend the frequency range from 906.0-922.06 MHz to 902.6 to 927.2 MHz. No hardware changes were made to extend the frequency range. There is no increase in the output power on the new frequencies. Per FCC KDB 178919 DO1 Permissive Change Policy v04r05, Section 4a this is acceptable as a Class II Permissive Change and does not require a new FCC ID.

The changes result in products that remain within the limits of 47CFR15.249.

These modifications will be implemented in all production units of the subject devices.

Sincerely,

Ken Meyer 7-19-2011

Ken Meyer
Regulatory Manager
Starkey Labs, Inc.