

**Chris Harvey**

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**From:** Generic Office of Engineering Technology [oetech@fccsun27w.fcc.gov]  
**Sent:** Wednesday, July 11, 2007 11:12 AM  
**To:** charvey@ieee.org  
**Subject:** Response to Inquiry to FCC (Tracking Number 177700)

**Inquiry:**

Dear FCC,

I am reviewing a TCB application for a VoIP Handset device (Pt. 15.247 and 15.407) where the proposed label is located on a dedicated battery/cover for this device. The battery is an integral part of the enclosure, as the case of the battery is part of the final outside enclosure of the device. They have provided several arguments for placing the label in this location:

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With regard to the location of the FCC ID, I would like to have the FCC reconsider the small size of the device and it's worldwide release, as well as our logic in placing the FCC ID where we did.

We feel that the location of the FCC ID is valid for the following reasons:

The device is very small and therefore label space is at a premium.  
The battery forms part of the device enclosure (the battery forms the back panel of the device)  
The device cannot be used without the battery, so the transmitter cannot operate unless the battery (and therefore the FCC ID) is present.

Here is our reasoning why we placed the FCC ID where it is:

The remaining space on the device label is dedicated for international approvals whose certification numbers we cannot predict. All predictable regulatory certification numbers (FCC ID, IC ID, EU Notified Body #, S. Korea ID, etc) were placed on a preprinted battery label so that the font size could be reduced & we could fit all of the Regulatory information on the device. If we move the FCC ID to the device proper, the font size will have to be much higher since this is the manufacturing label, and our manufacturing process requires a larger font to be legible.

Therefore, significant costs could be incurred since separate configurations will need to be created, stocked, and maintained for different geographical regions, instead of having one configuration and label set that works around the world.

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Please advise if the label placement will be acceptable for this application. I have attached the label/location exhibit for your reference.

Best regards,

Chris Harvey  
[charvey@ieee.org](mailto:charvey@ieee.org)

7/11/2007

**Response:**

FCC ID labeling guidance in ([http://www.fcc.gov/oet/ea/Labeling\\_Guidelines\\_Parts\\_15\\_and\\_18.pdf](http://www.fcc.gov/oet/ea/Labeling_Guidelines_Parts_15_and_18.pdf)) includes the following:

"The label shall be etched, engraved, stamped, indelibly printed, or permanently affixed to a permanently attached part of the equipment and be visible at the time of purchase on the exterior of the equipment enclosure.

"... the FCC label must not be placed on a removable part."

For this case, it appears grantee cannot ensure compliance for replacement and/or aftermarket batteries. However, the proposed scheme may be allowed if the battery-removable-part contains a security / authentication feature, activation chip, etc which prevents device operation with non-authorized batteries.

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