



Electronic Identification Systems

**Allflex USA, Inc.**  
2805 E. 14<sup>th</sup> Street  
DFW Airport, TX 75261  
USA

September 5, 2012

Equipment Authorization Division  
Federal Communications Commission  
7435 Oakland Mills Road  
Columbia, MD 21046

Re: Allflex Model No. RS420-45 / RS420-60  
FCC ID: NQY-30002

### **Request for Product Labeling Exception**

The Allflex RS420 is a radio frequency identification (RFID) scanner subject to certification requirements specified in CFR 47 Part 15 as a low power transmitter. Certification testing has been conducted by our TCB agency TIMKO and all electromagnetic compatibility compliance requirements have been achieved in accordance with FCC and with other international regulatory agency standards.

The RS420 is sold globally under the brand name "Allflex", and is also sold globally by Allflex distributors "Aleis" (as the model number EID8500) and "Destron-Fearing" (as the model number DTR5). Because Allflex cannot control where specific readers sold through its distributors are re-marketed, our TCB agency informs us that the product equipment labels must include all of the compliance indications that are required within all of the venues where the product could be used. The inclusion of these many indications has consumed all the space on the equipment label. Consequently, it is not possible to place the FCC "harmful interference" notice,

*This device complies with part 15 of the FCC Rules. Operation is subject to the following two conditions:*

- (1) This device may not cause harmful interference, and*
- (2) this device must accept any interference received, including interference that may cause undesired operation.*

Within the equipment label in a print size that is visually legible. Attached are exemplars of these equipment labels that illustrate insufficient space for compliance with this notice placement.

Allflex therefore requests, in accordance with CFR 47, Part 15.19 (a)(5), that the harmful interference notice equipment label requirement be excepted for this product, and that this FCC notice instead appear in the product user manual and on the product package label, as is illustrated in the attached exemplar of each. The equipment labels will always include the FCC ID number as is shown.

Respectfully,

Robert C. Stewart  
Technical Director  
Allflex USA, Inc.

A handwritten signature in blue ink that reads "Robert C. Stewart". The signature is fluid and cursive, written over a light blue background.