



December 1, 2017

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

Subject: FCC ID labeling on POMIINHBC1B0 wireless hearing aid

To whom it may concern,

Pursuant to CFR 2.925(f), IntriCon hereby applies to the FCC for authorization to apply alternate labeling for the identified device. We request permission to place the FCC ID: **POMIINHBC1B0** into the User Manual instead of on the device itself.

As can be seen in Figure 1, the wireless hearing aid is very small, and has a curved nature. This will make it difficult if not impossible to legibly mark the FCC on the wireless hearing aid device itself. The lower limit of our printing process is a font size of 4. In order to apply the FCC ID to the device, and accommodate all other required labeling, we would need to employ a font size of 2. At this size, the FCC would become illegible even under magnification.

To support this request, we are including the following documents with our submission for Certification of IntriCon's wireless hearing aid having an FCC ID of **POMIINHBC1B0**:

- Figure 1 on the next page showing curved nature, relative size, and available printed area, illustrating the difficulty of fitting "FCC ID: POMIINHBC1B0" on the Lumen 155 wireless hearing aid in addition to the other legally required markings.
- The relevant page from the User Manual showing the alternate FCC ID marking location and other Part 15 required wording.

Should you have any questions, please feel free to contact the undersigned.

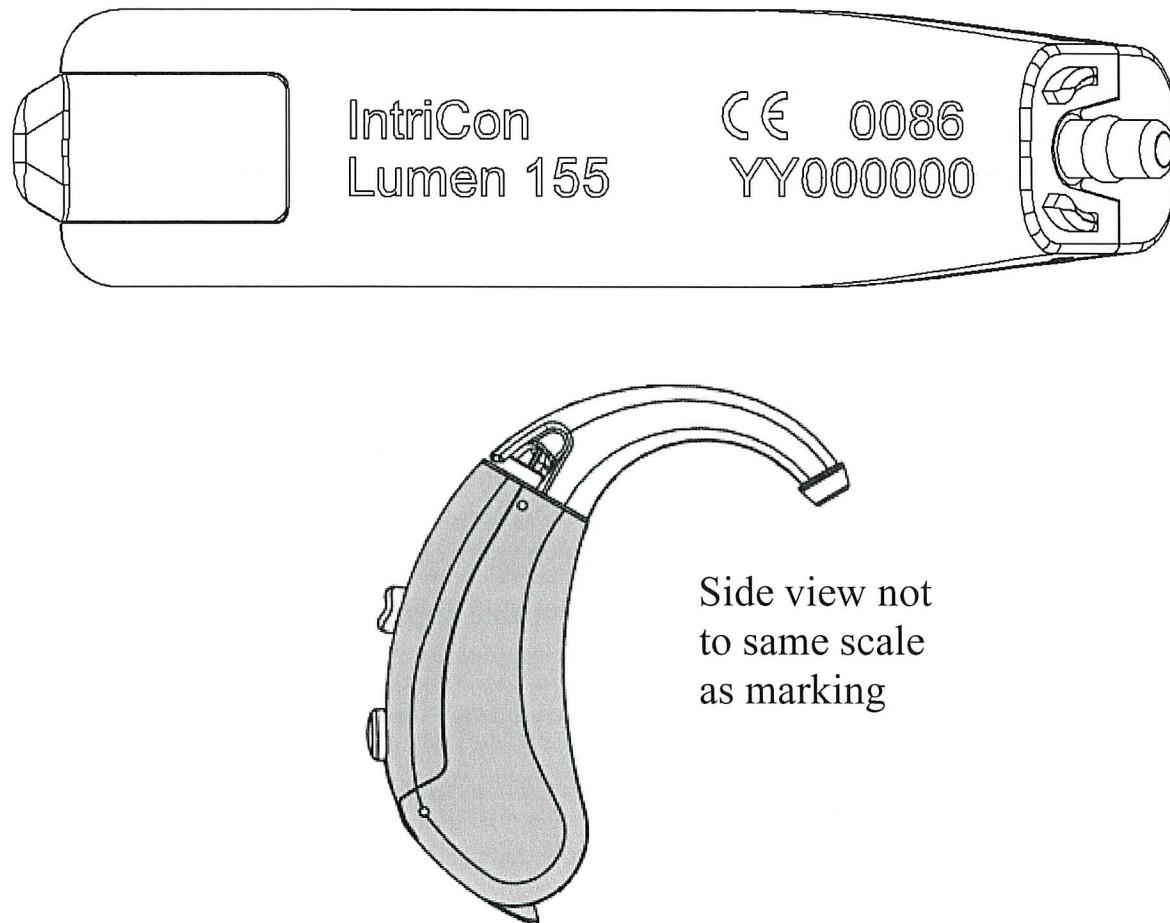
Sincerely,

A handwritten signature in blue ink, appearing to read "M. Johnson".

01 Dec 2017

Mitch Johnson, RAC
Director, Regulatory Affairs
651-604-9572
mjohnson@intricon.com

Figure 1 – Typical marking and curvature of Lumen 155



FCC Information:

FCC ID: POMIINHBC1B0

Per FCC 15.19(a)(3) and (a)(4), this device complies with part 15 of the FCC Rules. Operation is subject to the following conditions:

This device may not cause harmful interference, and this device must accept any interference received, including interference that may cause undesired operation.

Note: The manufacturer is not responsible for any radio or TV interference caused by unauthorized modifications to this equipment. Such modifications could void the user's authority to operate the equipment.

Radio Equipment Directive Information:

The equipment operates in the ISM 2.4 GHz band (2.40 - 2.4835 GHz), using the Bluetooth™ SMART protocol and IntriCon's proprietary audio streaming protocol, and the maximum RF Power transmitted in that band is -6.0 dBm EIRP.

Statement concerning the use of hearing instruments and life-sustaining implants

- IntriCon strongly advises users of hearing instruments to always follow the guidance set out in this hearing instrument user manual. When life-sustaining implants ("implants") (like pacemakers) are used along with hearing instruments, IntriCon strongly advises users to always follow the guidelines of the implant manufacturer as well.
- If you suspect any interference to your implant, please immediately stop using all other electronic devices, including your hearing instruments, and contact the manufacturer of the implant as well as IntriCon to advise about the suspected interference.
- To ensure our hearing instruments can operate safely and effectively in close proximity to other electronic devices, IntriCon hearing instruments have been proven to meet the requirements of the international standard for electromagnetic compatibility (EMC), IEC 60118-13, and ANSI C63.19.
- Life-sustaining implants are required to comply with the standards described in ANSI/AAMI/ISO 14117 on securing electromagnetic compatibility with other electronic devices including hearing instruments. As a consequence, implants complying with the ANSI/AAMI/ISO 14117 standards should continue to operate within the requirements of basic safety and essential performance when used with hearing instruments from IntriCon.