



**Randle Sherian**  
07/17/2003 12:55 PM

To: Tim Dwyer/US/TUV@TUV  
cc:  
Subject: FCC labeling question related to A3 Collector

Tim,  
Below is a string of emails between Mr. Joe Dichoso at the FCC and Elster Electricity addressing the labeling issue. In Elster's case, from the string of emails below and FCC 15.19(a)5,, I interrupt the section to allow the statement to be placed in the instruction manual or pamphlet and not on the EUT as long as the FCC ID number is viewable on the EUT.

Randy Sherian  
----- Forwarded by Randle Sherian/US/TUV on 07/17/2003 12:43 PM -----



**robert.t.mason@us.els  
ter.com**  
07/17/2003 11:53 AM

To: rsherian@us.tuv.com  
cc: charlie.cunningham@us.elster.com, charlie-cunningham@nc.rr.com  
Subject: FCC labeling question related to A3 Collector

Randy,  
Here is the string of emails we have had with Mr. Joe Dichoso at the FCC. It is our understanding that he told us that only putting the FCC Id on the front would be acceptable. The detailed wording will be contained on the transceiver (not viewable from the outside of the meter) and in the customer technical manual.

I'll give you a call to discuss.

Thanks,  
Bob

----- Forwarded by Robert T. Mason/USTRARIM-TEMP on 07/17/2003 11:51 AM -----

**Charlie Cunningham/USTRARIM-TEMP**  
04/29/2003 11:29 AM (Phone: +1-919-212-5023, Dept.: Electricity Metering - Product Development)

**To:** Robert T. Mason/USTRARIM-TEMP@ABB\_USTRA  
**cc:**  
**Subject:** Re: FCC labeling question - electricity meters

**Security Level:?** Internal

Bob,

FYI

The implication of Joe's response seems to be that we can place the Part 15 interference statement in the manual. I'll bring you hard copy of 15.19(a)5.

Charlie

----- Forwarded by Charlie Cunningham/USTRARIM-TEMP on 04/29/2003 11:25 AM -----

**"Joe Dichoso" <jdichoso@fcc.gov>**

04/08/2003 02:20 PM

**To:** Charlie Cunningham/USTR/RIM-TEMP@ABB\_USTRA

**cc:**

**Subject:** Re: FCC labeling question - electricity meters

**Security Level:?** Internal

Hello Charlie,

See Section 15.19(a)5 for guidance on placing the 15.19 statement in the manual. It appears that it would be appropriate for your device. I did not see the FCC identifier on the outside of the device in the photo's you sent. The FCC identifier must be viewable on the device.

Regards,

Joe

If you still want to discuss, please give me your number and the best times to reach you.

>>> charlie.cunningham@us.abb.com 04/08/03 10:56AM >>>

Hi, Joe.

No, the radio shield wouldn't be visible from the exterior. I'm forwarding the product description, label drawing and photos.

The problem is getting the full text of the FCC statement into the available externally viewable area with the 8-point minimum type size specified by the Commission.

As indicated in my letter yesterday, at least one of our competitors has apparently obtained approval to place only the FCC ID on the externally viewable nameplate and the full disclaimer text is placed internally.

In another case, that I'm aware of, the mouse for my Compaq computer has an FCC ID on the base and says "This device complies with Part 15 of the FCC Rules. See instruction manual for FCC statement." The type is less than 8-point.

Any help or relief would be most sincerely appreciated. It is always our position here at Elster (formerly ABB and Westinghouse) to fully comply with the FCC Rules and Regulations. The problem here is the limitation of externally viewable area on the nameplate behind the transparent viewing area in the exterior cover. Since these electricity meters are intended to operate for years in an outdoor environment, a stick-on label on the exterior cover isn't really practical either and generally the Commission takes a dim view of those.

May I give you a call to kick this around a bit and attempt to determine how we can satisfy the Commission's requirements?

Thanks.

Charlie Cunningham

(See attached file: REX Meter Description for FCC.doc)(See attached file: 1b11563.pdf)(See attached file: Dscn0234.jpg)(See attached file: Dscn0235.jpg)

"Joe Dichoso" <jdichoso@fcc.gov>

04/08/2003 10:18 AM

To: Charlie Cunningham/USTRA/RIM-TEMP@ABB\_USTRA  
cc:  
Subject: Re: FCC labeling question - electricity meters

Security Level:? Internal

Hello Charlie,  
I don't recall whether the FCC text was viewable from the outside of the device when it is placed on the radio shield. Can you send another photo? The identifier and statements should be viewable.

>>> charlie.cunningham@us.abb.com 04/07/03 01:34PM >>>

Hi, Joe

Thanks for your reply. I was out of the office the latter part of last week so I've just had time to respond.

Joe, I'd like to ask if it would be acceptable to place the FCC ID on the front-panel nameplate and place the rest of the label text, prescribed by Part 15, interior to the meter. The problem is that we really don't have the space on the nameplate to implement the full text of the label with the 8-point minimum type size specified in the FCC Rules.

If we place the FCC ID on the nameplate, where it is externally visible, would that address your point that the FCC ID needs to be externally visible to identify the product in the event that there is an interference issue.?

One of our competitors, Schlumberger, has a similar problem with nameplate space and they have apparently obtained Commission approval to place the FCC ID on the nameplate and they have the balance of the text, along with the FCC ID etched into the main printed-circuit assembly within the interior meter. Their FCC ID is F9CC1C-1.

If we follow a similar procedure, and place the FCC ID on the externally visible nameplate, and place the full label text in the interior of the meter, on the radio shield, where it would be readily viewable, would that be acceptable to the Commission?

Thanks very much for your help, Joe.

Regards,

Charlie Cunningham  
Senior Design Engineer

"Joe Dichoso" <jdichoso@fcc.gov>

04/02/2003 03:14 PM

To: Charlie Cunningham/USTRA/RIM-TEMP@ABB\_USTRA  
cc: "Rich Fabina" <rfabina@fcc.gov>  
Subject: Re: FCC labeling question - electricity meters

Security Level:? Internal

Hello Mr. Cunningham,  
Your inquiry was forwarded to me for reply. The FCC label must be viewable on the outside of the device. It cannot be on the inside. If interference were to occur, the fcc identifier would be needed to help identify the responsible party.  
Regards,  
Joe

>>> charlie.cunningham@us.abb.com 03/25/03 01:51PM >>>  
Good morning, Rich

I am writing to ask your opinion/interpretation of our FCC labeling

options for our new line of wireless-access electricity meters. Our company, now Elster Electricity, LLC, formerly ABB Electricity Metering, formerly Westinghouse Meter Division has been in the electricity metering arena for decades and in recent years we have begun developing wireless-access electricity meters.

This inquiry pertains to our new line of wireless-access residential electricity meters. These devices will operate as frequency-hopped devices in the 902 MHz ISM band, under Part 15.247 of the FCC Rules and Regulations.

My specific question, Rich, is: Would it be acceptable to the Commission to place the FCC label, containing the Part 15 compliance statement and the FCC ID interior to the meter on the radio shield that is visible in the lower section of the printed-circuit board seen in the interior view?? We have very limited space on the nameplate at the front of the meter module for a label.

In addition, we will be employing an identical radio and shield in another metering product, where the radio will be part of a removable option board, rather than part of the main meter assembly. It will be most desirable in the latter case to make the FCC label part of the option board assembly. It would be most helpful if we could follow the same labeling practice in both products.

Additionally, it is worth noting that the meter will be the property of the electric utility serving a particular site, and if the meter should ever be a source of interference, then a call to the utility, either by the party who is interfered with, or by the Commission would produce the appropriate information and manufacturer contacts etc.

I am attaching a preliminary product description, label drawing (.pdf) and exterior and interior photos of the meter.

An opinion from you, regarding placement of the FCC label on the interior radio shield assembly, would help greatly in addressing our labeling options.

Thanks and best regards.

Charlie Cunningham  
Senior Design Engineer

(See attached file: REX Meter Description for FCC.doc)(See attached file: 1b11563.pdf)(See attached file: Dscn0235.jpg)(See attached file: Dscn0234.jpg)