Telit Wireless Solutions GmbH · Friesenweg 4 · 22763 Hamburg

Attn: Reviewing Engineer
Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046

Hamburg, 23.11.2017

Re: Permissive Change Request

Model Name:	BL871E2-HI
FCC ID:	RFR-BL871
IC:	23249-BL871

Identifier Marking for OEM Bluetooth Module BL871E2-HI,

This Permissive Change Request became necessary because FCC Certification had been conducted with a label fully covering the shield. This is not feasible for mass production, because the label affixing process needs a tolerance, otherwise it leads to labels overlapping the shield and getting destroyed in further production processes. Therefore, we had to shrink the label size to 7.5mm x 4mm for maintaining our quality goals.

With this Permissive Change Request, we want to ask FCC for the permission to place the FCC ID on the dry bag label, the protective card box and the user manual according to §2.2 of KDB784748 D01 “Labeling Part 15 & 18 Guidelines v08” instead of on the device label.

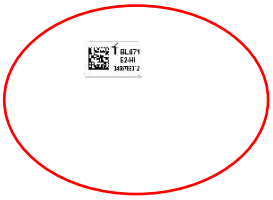
Justification

The module is a Surface Mount Device soldered onto the end product and is not accessible to the end user. It is not possible for the end-user to replace or remove the module. The modules are shipped to the end product manufacturer as components on tape-and-reel in a sealed dry bag. On the sealed dry bag, a label showing the FCC ID is affixed. The sealed dry bag is enclosed in a protective card box, which also has a label showing the FCC ID.

The BL871E2-HI module size is 10.1mm x 9,7mm with a shield sized 9,1mm x 5,75mm. The area of the BT Module not covered by the shield is used for an integrated antenna and cannot be used for labels. A label considering the mass production placement tolerances is then 7,5mm x 4mm, which gives from the ideal position a gap to all sides of 0,8mm.

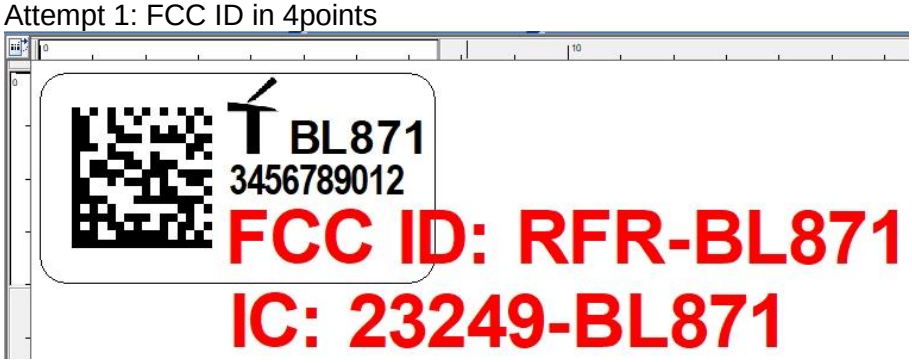
BL871E2-HI device with label actual dimensions 9.7x10,1mm

BL871E2-HI device label actual dimensions 7,5x5mm



KDB784748 D01 §2.2 defines that it should be possible to print the FCC ID readable without magnifying glasses on the label. The minimum readable size is given with size of 4-6 points. Otherwise the Module manufacturer should ask the FCC tor the permission to publish the FCC ID in the user manual. The following pictures show some attempts to place the FCC ID on the label.

Attempt 1: FCC ID in 4points

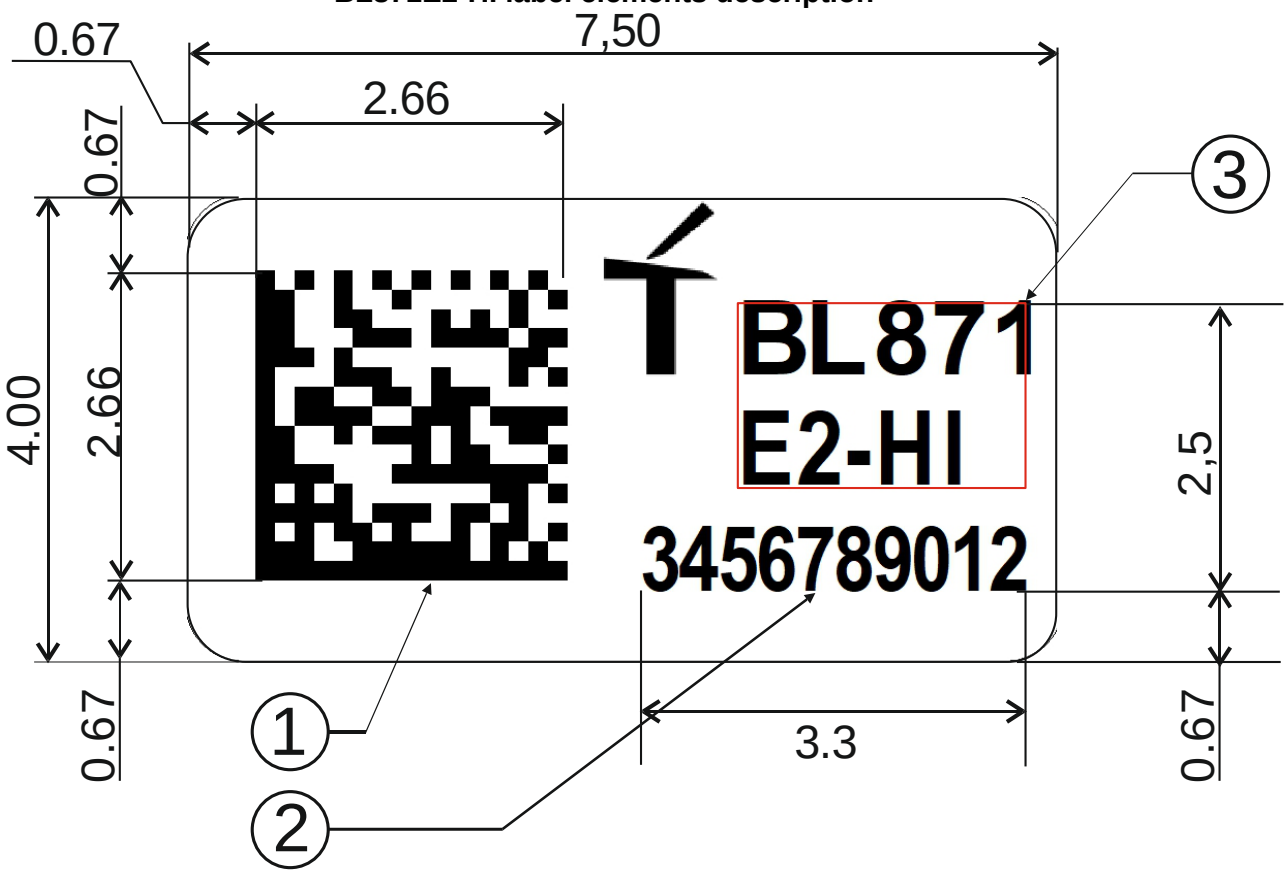


Attempt 2: FCC ID in 2points

2points is not readable without magnifying glasses, at least not for me.

If the requested permission was granted by the FCC, the device label specification would be

BL871E2-HI label elements description



1) Barcode type 2D datamatrix, ECC200 containing serial number
2) Module Serial number clear writing font Arial 2pt
3) Module Model/Commercial name font Arial 2.5pt

The package label would show the FCC ID on the sealed dry bag and the protective carton for customs.

Additionally, the FCC ID is stated in the User's Manual

Instructions for the OEM on how to attach the auxiliary label in compliance with the modular Approval Guidelines are given in the User's Manual. The instructions inform the OEM that he has to affix a label to the exterior surface of his end product such that it'll be visible for inspection. If the end product was large enough, also the compliance statement should be printed on the label.

This label will have at least the information shown in the figure below:

This device contains
FCC ID: RFR-BL871
IC: 23249-BL871

Kind regards

i.A. Jens Jensen
Certifications Manager
Telit Wireless Solutions GmbH