



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

SHD-A8YWFS

Gentlemen,

OQO, Inc. is requesting an interpretation regarding Section 2.925 (d), which states that the FCC ID label shall be readily visible to the purchaser at the time of purchase. The design of the OQO product is such that the unit's FCC ID will be readily visible to the user before installing the battery. Also, per Section 2.925 (d)(2), it further states that it will be "preferred that the label be visible at all times", but that it is not a prerequisite for approval. Although cellular handsets (licensed radios) are allowed to have the FCC ID underneath the battery, Section 2.925 does not reference such authorization being unique to cellular handsets. We request that the FCC allow section 2.925(d)(2) to be applicable to our device, since the product is too small to have the label anywhere else. Such a decision to allow certain radios, but not all, to have the FCC ID label underneath the battery is placing undue burden on the manufacture.

OQO's most recently certified product, the "Model 02", with FCC ID SHD-A7YWFS, had its grant application in January of 2007. The FCC ID label was placed inside the battery compartment on that device. Authorization for this label location was given by the Commission in November 2006. That device is still manufactured and sold, and still adheres to the above FCC sections. The battery is not connected to the device when shipped to the customer. An explicit packaging label directs the customer to the FCC label on the inside of the battery compartment.

OQO's updated product, the subject of this request, is virtually identical to the original "Model 02" (increasing the CPU clock frequency from 1.5 GHz to 1.6 GHz), with the FCC ID inside the battery compartment. This updated model is now ready for mass production. Again, the battery is not connected to the device when shipped to the customer. Again, an explicit packaging label directs the customer to the FCC label on the inside of the battery compartment.

OQO appreciates the Commission's consideration of allowing OQO to continue to place the FCC ID in the existing location in its products - inside the battery compartment, in accordance with the current FCC regulations.

Sincerely,

Hans Hartmann  
Vice President of Engineering  
OQO, Inc.