REASONING PANASONIC BT MODUL PAN1782 WITHOUT FCC ID ON PRODUCT CAUSED BY SIZE RESTRICTIONS

In KDB784748D01V09r01 chapter 3 the FCC states the following:

(3) CERTIFICATION

For certification, the product shall bear a nameplate or label with the FCC Identifier (FCC ID), as defined in Section 2.925.13 The FCC ID must always be accessible when using the product. The placement of the FCC ID must be a physical label on the product, unless an e-label is used.

Physical FCC ID labels must be located on the surface of the product, or within a user-accessible non-detachable compartment (such as the battery compartment). The label shall be permanently affixed, permitting the device to be positively identified. The font needs to be readily legible, consistent with the dimensions of the equipment and its label area.

When the device is so small, or for such use that it is impracticable to label with a font size that is <u>four-points or</u> <u>larger</u> (and the device does not utilize electronic labeling), then the FCC ID shall be placed in the user manual, and the FCC ID shall also be placed either on the device packaging or on a removable label attached to the device

Definition of point (pt)

A computer point (pt) is the smallest unit of measure in typography. It is a subdivision of the larger pica. The contemporary desktop publishing point (also called the PostScript point) was defined as 72 points to the inch (1 point = 1/72 inches = 25.4/72 mm = 0.3527 mm).

Conversion 4pt to mm

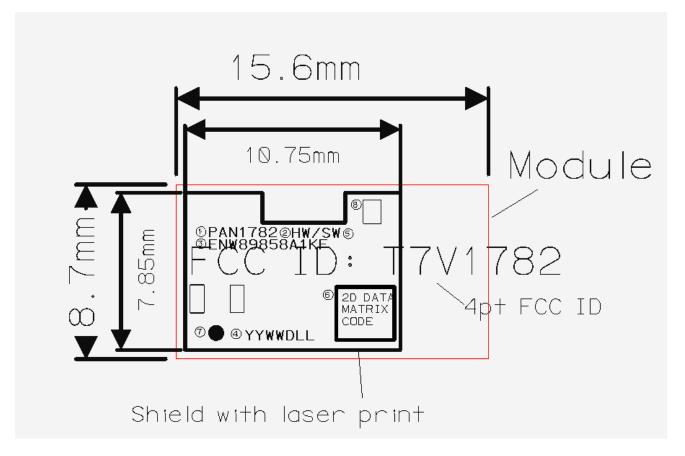
4pt = 0.3527 x 4mm = 1,4108mm

The below dimensioned and magnified graphic shows the product with the actual label and a visualized FCC ID printed in 4pt font size. It demonstrates that the FCC ID doesn't fit on the label if printed in 4pt.

The brand name, product number, lot code and 2D data matrix code are laser printed in a font smaller than 2pt and are intended to be read by machines (scanner) or in a factory using a microscope.

This product is intended to be sold to OEM's only. The OEM is obliged to print on the label of the end product containing this BT module the following

This product contains transmitter FCC ID: T7V1782



Module Laser Marking Description

No.	Item	ENW89858A1KF
1	Series (Brand)	PAN1782
2	HW/SW Version	HW Major Hardware Version: please refer to MS-CS-PAN1782 document SW Major Software Version: please refer to AI document
3	ENW-No. / Model Name	ENW89858A1KF
4	Lotcode (YYWWDLL)	YY - Year
		WW - Calendar Week
		D - Day of Week (e.g. Friday is 5)
		L - Line
		L - Lot
5	ES Marking	Need to be mentioned during ES status (remove ES for MP) Necessity of ES marking will also be stated in the ECN
6	2D Data Matrix Code	Contains in total 30 characters, separated by a semicolon. YYWWDLL;HHHHHHHH;89858A1;HW(Minor Version);SW
		YYWWDLL Production Date Code (see No. 6 above)
		HHHHHHHH Last eight digits from hexadecimal Panasonic Mac Address (example: 001343ABCDEF)
		89858A1 Part of the ENW-Number
		HW(Minor);SW(Minor) Minor Hardware and Minor Software Version, each 2 digits, please refer to MS-CS-PAN1782 and AI Document
7	Pin 1 Mark on Top Side	Fix, no change at all
8	BT marking	Bluetooth logo