

Federal Communication Commission  
Equipment Authorization Division,  
Application Processing Branch  
7435 Oakland Mills Road  
Columbia, MD 21048

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To Whom It May Concern

ID Label/ Label Location – Unitron Max SP BTE

Pursuant to paragraph §2.925 of 47 C.F.R. the hearing instrument Unitron Max BTE, which is subject of this filing, shall bear a permanently affixed, readily visible label listing the information as specified in §2.926 and §15.19(a) of the 47 C.F.R. Due to the specific use of the hearing instrument (as shown in figure 1) its external surface is in contact with the user's skin behind the ear.



Figure 1: Position of the Hearing Instrument on the User

Therefore, it is not appropriate to permanently affix a label on the outer surface of the device to prevent skin irritations. The only alternative place for the FCC ID and serial number of the device would be in the battery compartment.



In this case the size of the FCC ID will be smaller than 2 points, which does not satisfy the requirements for "readily visible" label as defined in §2.925 (d)(2) and §2.925(g).

Due to the small size of the devices and pursuant to paragraph § 15.19(a)(5) of 47 C.F.R., the FCC ID and the statement specified in §15.19(a)(3) are placed in the user manual as per the label exhibit #3.

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