E-Labeling Guidance
KDB 784748

Office of Engineering and Technology
Laboratory Division
Labelling Requirements

- Equipment authorization labelling rules require: “nameplates or a label” to be
  - “permanently affixed” to the equipment, and
  - visible at time of purchase
- In certain cases where it is difficult or not feasible, exceptions have been made
- In case of Software defined radios or certain modules, electronic labels have been permitted
- Recently issued guidance for allowing certain devices to use electronic labels (e-label)
E-Label Guidance

Devices must have integrated display to show the label information
- Modular transmitters must be installed in hosts which have integrated display or provide information through authenticated interface for the host to display
- Remote displays or networked access terminals do not qualify, displays must be locally attached

FCC ID and/or DoC label requirements can be displayed electronically
- Rule-specific information may be included electronically, but also must satisfy rule-specific requirements for display (e.g. Part 20.19 or 20.21 requirements);
  - E-labels do not replace rule-specific external label requirements
- Information must clearly differentiate appropriate rule-specific requirements
Access to Information

- Users must be able to access information without special codes or accessories
  - Menu’s must not require more than three steps
- Devices must not require special accessories like SIM /USIM cards
- Users must be provided specific instructions on how to access the information
- Equipment authorization applications must clearly include instructions for accessing information in “Label Exhibit”
- Grantees must ensure the information is secure and cannot be modified by unauthorized parties
Label Display for Importation and Marketing

Devices must have a physical label on the product at the time of importation, marketing and sale

- Labels can be “removable stickers”
- Labels on protective bags or on package are acceptable
- All necessary information must be included in such labels
- Labels must be able to survive normal shipping and handling
- Such labels must only be removed by the customer after purchase
Guidance published in KDB Publication 784748 D02

Applies to new products
  – Upgrades to existing products under review

Congressional action may require further review
  – House and Senate have passed versions of “Enhance Labeling, Accessing and Branding of Electronic Licenses Act”
    • “E-Label Act” (H.R 5161, S. 2583)
Questions and Answers

Thanks!