



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



Current Guidance

- 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!