



# **Labeling**

## **Report and order FCC 17-93**

Jim Szeliga  
Laboratory Division  
FCC



# Labeling For Report and Order FCC 17-93

- This presentation covers labeling and compliance information as modified by R&O 17-93:
  - SDoC ( §2.1077)
  - Certification (§2.925 & §2.926 )
  - Electronic Labeling (§2.935)



# SDoC ( §2.1074 & §2.1077)

## ● Labeling: Unique Identifier §2.1074

- A means to positively identify the product and associate the compliance test reports and records (§ 2.938 Retention of records).
- Example: trade name, and model number, serial numbers or other means employed by internal manufacturing processes.

-  The FCC logo is optional and can be on the product and /or include it in user's material or as an e-label to indicate that the product has been tested and complies with the SDoC procedure.

## ● Compliance Information: §2.1077

- Identification of the product e.g. Name model, etc.
- Compliance statement(s) including those as applicable by the rules.
  - e.g., the product complies with the rules- such as §15.19 (a) (3). This device complies with part 15 of the FCC Rules. Operation is....
- The identification by name, address and telephone number of the **responsible party that must be located in the US** (as defined in §2.909)
- Must be supplied with the product in a form that an end user would ordinarily expect to access for product information such as the user's manual, a separate product insert, computer disk or over the Internet or if qualified by e-labeling.



# Certification (§ 2.925 & §2.926 )

- § 2.925 Identification of equipment that does not utilize e-labels
  - As in the previous rules, a permanently affixed label on the product located on the surface of the product or within a user accessible non detachable accessible compartment (such as the battery compartment) is required,
  - The only major change to §2.925 (f):
    - clarifies that if a device is so small that it is impractical to label it with the FCC Identifier in a font that is four-point or larger, then the FCC Identifier shall be placed in the user manual and must also either be placed on the device packaging or on a removable label attached to the device.
- §2.926 FCC identifier
  - As in the previous rules The FCC ID must always be accessible when using the product.



## E-labels (§2.935)

- Products with integral display, or
- Products that operate in conjunction with another device that has an electronic display may qualify for e-labeling.
  - Information that can be displayed electronically.
    - Information that was required to be on the surface of the product and user's manual for SDoC and/or Certification such as FCC ID, logo, compliance statement, model number/unique identifier or other regulatory information to end users.
  - Compliance information must be in a hardened factory non-alterable format and displayed locally by the end user in possession of the product.



## E-labels (§2.935)

- Information that can not be only displayed electronically
  - Information specifically required by a rule in addition to §2.925 and §2.926 to be physically displayed on the product, as a plate on the product, on the packaging, or signage. [see R&O FCC 17-93 ¶ 42]
  - For example:
    - Emergency beacon devices [sections 95.2993 (personal locator), 80.1061 (Positioning), 87.199 (locator beacons)]
    - Section 95.2393 (coordination requirement) medical telemetry, and section 95.2593 (non-interference) MedRadio equipment.
    - Section 20.19 (f) “clearly display the rating (HAC)...on the packaging material of the handset”.



## E-labels (§2.935)

- Compliance information must be accessible in three steps. Example:
  - Unlock or log into a home or main access screen does not count- (the top layer screen providing the visual interface that allows a user to access all the device functions)
  - Step 1, accessing submenu - [Settings or About]
  - Step 2 access submenu – [Legal & Regulatory]
  - Step 3 access submenu –[Regulatory]
- Instructions to access regulatory information must be provided at the time of purchasing, in the user manual , operating instructions, packaging material or quick guide pamphlet, etc.



# E-Labels (§2.935)

- Temporary labels
  - Devices using E-labels must also use a temporary physical label either on the device or packaging with the FCC ID or other compliance information at the time of importation, marketing and sales.
  - This temporary label can be a removable adhesive label of a type intended to survive normal shipping and handling.
  - Products imported in bulk, not packaged individually, may have a temporary removable adhesive label on the product, or temporary or permanent labels on the shipping packaging or protective bags.



# E-label Examples

## Products with integrated displays

- ✓ Smart Phones
- ✓ e-readers
- ✓ Laptops,
- ✓ Tablets
- ✓ Internet radios or products with digital displays



# E-labeling Examples

- Products used to operate with another device that has an electronic display
  - Game Consoles
  - Set Top Boxes
  - Media Streaming Devices
  - Desktop Personal computers
  - Access points with built in Web Server. Locally accessible through a computer browser on a local area network.
  - Products accessible locally via smart phone or Computer with dedicated application via blue tooth or WIFI.
    - Wearable device without display
    - Wireless USB dongle
    - Monitors
    - IP Cameras
  - Baby Monitor with dedicated companion display unit.