

**Federal Communications Commission
Office of Engineering and Technology
Laboratory Division**

Public Draft for Review

May 9, 2014

Draft Laboratory Division Publications Report

Title: ELECTRONIC LABELLING GUIDANCE

Short Title: e-labelling

Reason: Major modification to publication 784748 to include guidance for electronic labeling (e-labelling).

Publication: 784748

Keyword/Subject: Labelling Guidelines, Electronic Labelling, Information to User, Information in Manual, User Manual.

Question:

What guidance is available for labelling devices and providing regulatory information to users? What guidance is available using electronic labels?

Answer:

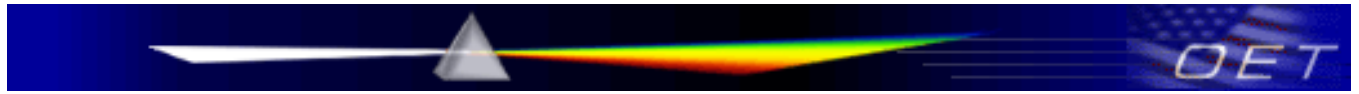
Guidelines for labelling and user Information for most devices including Part 15 and Part 18 devices are contained in the attached document [784748 D01 Labelling Part 15 18 Guidelines v07](#).

Guidelines for providing alternative means of displaying label information electronically (e-label) are contained in the attached document [748748 D02 e labelling v01](#). Note: This draft is only for comment and will only be effective after final publication.

Attachment List:

784748 D01 Labelling Part 15 18 Guidelines v07

[784748 D02 e labelling v01](#)



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ELECTRONIC LABELLING GUIDANCE

I. Introduction

Equipment covered in an application for certification is required to bear a nameplate or a label listing the FCC Identifier (FCC ID) and any other statements or requirements imposed by the rules governing the operation of that specific equipment.¹ The rules also require the nameplate or label to be permanently affixed to the equipment and that it shall be visible to the purchaser at the time of purchase.² In many instances, it is not practically feasible or appropriate to place a permanent legible label on the device. Many consumer devices have very small surface areas for a label, or when etched on the surface, the labeling may cause damage or require very expensive techniques. In such instances, the rules permit the Commission to approve alternative means of displaying the required information.³ The rules already permit devices approved as software-defined radios and modular transmitters to display compliance information electronically through a display where available.⁴

This document provides guidance for devices with an integrated display screen to present the required label information electronically (e-label) in lieu of a physical label or nameplate. This guidance applies to all devices which have an integral (non-removable) display screen and are currently subject to certification requirements. These include devices that have an integrated display or devices that are subject to rules for software-defined radios or modular transmitters and are used in a host device that has a display.

II. Guidance for devices with integrated screen using e-label

a. Information to be displayed

- i. The FCC ID and the Declaration of Conformity (DoC) logo (if applicable).⁵
- ii. Any other information required by specific rule to be provided on the surface of the product.

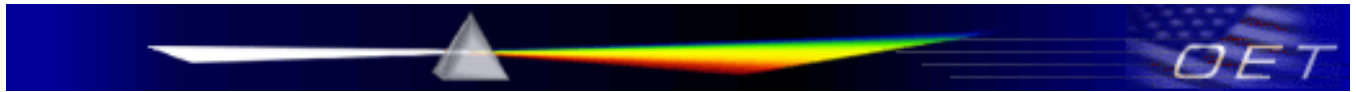
¹ § 2.925 (a).

² § 2.925(d)

³ § 2.925(f)

⁴ §§ 2.925(e) and 15.212 (a)(1)(vi)(B) and KDB Publication 442812 – Software Defined Radio Application Guide

⁵ This procedure only applies to devices subject to certification. See II(d)(vi).



b. Access to the required information on the e-label

- i. Users must be able to access the information without requiring special access codes or permissions and, in all cases must be accessible in no more than three steps in a device's menu.
- ii. Devices must not require special accessories or supplemental plug-ins like the installation of a SIM/USIM card to access the information.
- iii. Users must be provided specific instructions on how to access the information. The instructions may be included in the User's manual, operating instructions, insert in the packaging materials, or other similar means. The access information must also be available on the product related website.
- iv. The equipment authorization application for the device must clearly include the instructions for accessing information as part of the exhibit showing the label information.

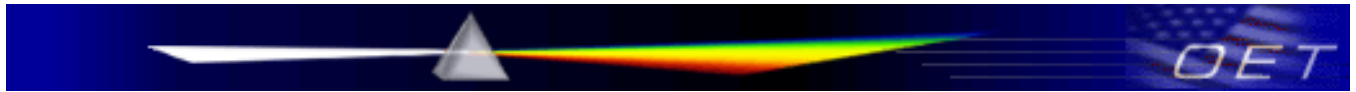
c. Removable Adhesive Labeling for Importation and Purchasing

Products utilizing e-labels are required to have a physical label on the product at the time of importation, marketing and sales. A removable adhesive label is acceptable for this purpose. Any removable label shall be of a type intended to survive normal shipping and handling and must only be removed by the customer after purchase. It shall contain:

- i. The FCC ID and the DoC logo (if applicable); and
- ii. Any other information required by specific rule to be provided on the surface of the product unless such information is permitted to be included in the User's manual or other packaging inserts.

d. Other considerations

- i. The above information must be programmed by the responsible party and the information must be secured in such manner that third parties cannot modify it.
- ii. Product packaging material must display the FCC ID and, if applicable, the Doc logo as required by the applicable rules.
- iii. All the applicable regulatory information required on the packaging or user instructions must be provided according to the rules even if it is displayed electronically. For example, hearing-aid compatibility (HAC) ratings for the phones as specified in § 20.19.
- iv. E-label displays may include regulatory information required to be placed in the User's Manual or on the packaging into placing the information as required by the rules. The following considerations must be taken into account for such information distribution.
 1. If the primary user manual or user guide is provided by other electronic media (*e.g.*, CD, or online access) then as an option this information can also be provided as part of the e-label.
 2. The e-label format must clearly differentiate between the information required to be on the surface of the product and the information required for the User's Manual or on the packaging.
- v. Products subject to Certification and Declaration of Conformity or Certification and Verification can use the e-label guidance by displaying both the FCC ID and an image of the FCC DoC Logo, or FCC ID and product identification as required by the rules.



- vi. Products only subject to DoC or Verification cannot use e-label procedures. Such products must place the appropriate information required by the rules.⁶

III. Devices approved as Certified Transmitter Modules

Devices approved as certified transmitter modules may have their FCC ID information displayed electronically, if the module has a display or the host in which it is integrated has a display screen.⁷ The general guidance for all transmitters discussed above also applies to such devices. In addition, the following apply:

- i. If the certified transmitter module provides a secure electronic exchange interface with authentication between the host with integrated display and the module to identify the correct FCC ID, then the host can display the FCC ID information on the host's built-in display. The module can be either user-installable or a factory-installed module. The authorization for equipment authorization for such modules must include a description of the secure electronic exchange protocol and the security of such arrangement.⁸
- ii. If the certified transmitter module does not provide a secure electronic exchange interface with authentication, the host manufacturer can electronically display the FCC ID information on the host by factory-encoding the FCC ID of the module. Factory encoding must be secure and locked by the host manufacturer and not alterable by any third parties. The programmed information must display "Contains FCC ID XYZNNNNN".
- iii. Multiple modules in a host can be electronically displayed as "Contains FCC IDs XYZNNNN1, XYZNNNN2", etc.

It is the responsibility of the grantee of the module to provide OEM installation instructions to the host manufacturer on how to integrate FCC e-labeling information on the host. In all cases, the host end-user manual must provide clear instructions on how end-users can find and/or access the FCC ID.

⁶ See §§ 2.954, 2.1074 and 15.19

⁷ See KDB Publication 996369 for further guidance on certified transmitter modules.

⁸ The module must have its own FCC ID displayed unless it also has an integrated display.