

June 2, 2014

Attn: Dr. Rashmi Doshi  
Chief, Laboratory Division  
Office of Engineering and Technology  
Federal Communications Commission  
7435 Oakland Mills Rd.  
Columbia, MD

Reference: Comments of the Hewlett-Packard Company on Draft Knowledge Database  
Publication 748748 D02 e labeling v01 (Electronic Labeling Guidance)

Dear Dr. Doshi,

Thank you for the progress in addressing product labeling, an increasingly complex area of concern for manufacturers. The Hewlett-Packard Company (HP) has read the draft document 748748 D02 e labeling v01 and offers the following comments:

#### **Section I Introduction**

Please revise the second paragraph of the introduction to remove the restriction that electronic labeling (e-labeling) can only be used on devices subject to certification requirements. Many screen based mobile products include factory installed FCC certified modular radios so the host product itself is only subject to DoC authorization. Under this current KDB draft a notebook with WLAN with a system certification can use e-labeling for the notebook's DoC logo, but that same notebook with WLAN using modular certification cannot use e-labeling for the notebook's DoC logo. These DoC products that incorporate a certified modular radio device should be able to include the FCC logo as part of the e-label displaying the modular radio information.

Section II.d.vi. would also need revision to make is clear the II.d.vi requirement does not apply to a product incorporating a FCC certified modular radio device and utilizing e-labeling to display the certification information for the radio module and the FCC logo for the host product.

#### **Section II.a.ii**

Please replace the proposed text with that from Section II.c.ii which reads "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". We believe that confusion will be avoided by having both the Sections read the same as in Section II.c.ii. Information that may already be put into the manual does not need to be shown via the electronic display.

#### **Section II.b.i**

Please ensure that this is worded to allow manufacturers the option of providing users with this information that is available at initial startup (i.e. BIOS setup) of the device instead rather than through the device's menu (i.e Operating system). This would provide manufacturers the ability

to protect the FCC markings from accidental deletion by the user should the user decide to replace the operating system.

### **Section II.c**

#### **Section II.d.ii**

Please reduce the burden on manufacturers this combination of requirements imposes. A manufacturer choosing to e-label a product should be required to provide only one additional form of marking communication which, with the manufacturer selecting from a) removable adhesive label, or b) packaging label, or c) printed user documentation. Any one of these communication forms should suffice for information need at importation and user purchasing.

#### **Section II.d.iv**

Please reword the first sentence of the first paragraph as the phrase “into placing the” does not seem to make sense.

### **URLs and QR codes**

HP strongly encourages the FCC to include a provision permitting a manufacturer to place a web page URL or QR code on the product enclosure in lieu of all required product markings provided they direct the user to the required markings on the internet. Assuming a product user can access the internet to look up and verify an FCC ID marked on the product (or from e-labeling), we can assume that the user can enter a web address or scan a QR code to take them directly to the required markings and other compliance information for the product on a website.

HP respectfully requests the OET Laboratory consider the above comments in preparation of this KBD for publication. Please contact me if there are questions or if HP can be of more assistance in this matter.

Respectfully Yours,

A handwritten signature in black ink that reads "Walter Overcash". The signature is written in a cursive style and is enclosed within a thin black rectangular border.

Walter Overcash  
Product Regulations Engineer  
Hewlett-Packard Company

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