



TELECOMMUNICATIONS  
INDUSTRY ASSOCIATION

1320 N. Courthouse Rd., Suite 200  
Arlington, VA 22201 USA  
[www.tiaonline.org](http://www.tiaonline.org)

Tel: +1.703.907.7700  
Fax: +1.703.907.7727

**By Electronic Delivery via <https://apps.fcc.gov/oetcf/kdb/index.cfm>**

June 13, 2014

Attn: Dr. Rashmi Doshi  
Chief, Laboratory Division  
Office of Engineering and Technology  
Federal Communications Commission  
7435 Oakland Mills Rd.  
Columbia, MD 21046

**Re: *Comments of the Telecommunications Industry Association on Draft Knowledge Database Publication 748748 (Electronic Labelling Guidance)***

Dear Dr. Doshi:

The Telecommunications Industry Association<sup>1</sup> (“TIA”) hereby submits input to the Federal Communications Commission’s (“FCC”) Office of Engineering and Technology Laboratory Division (“OET Labs”) on its draft Knowledge Database (“KDB”) Publication 748748, titled *Electronic Labelling Guidance* (“Draft KDB 748748”).<sup>2</sup> TIA applauds the FCC’s efforts to realize eLabeling’s potential. Indeed, the FCC’s issuance of Draft KDB 748748 reinforces its role as a global leader in regulatory approaches which foster innovation and advance public policy goals.

---

<sup>1</sup> TIA is a trade association based in the Washington, DC area which represents the global information and communications technology (“ICT”) manufacturer, vendor, and supplier community through policy advocacy and standards development. TIA is also accredited by the American National Standards Institute (ANSI) as a standards developer for the telecommunications sector. From a policy perspective, TIA’s Technical Regulatory Policy Committee (“TRPC”) serves as a consensus manufacturer partner with the FCC, telecommunications certification bodies (“TCBs”) and other stakeholders towards streamlining and clarifying the mechanisms of equipment certification processes and procedures. See <https://www.tiaonline.org/policy>.

<sup>2</sup> See Office of Engineering and Tech., FCC, Draft Laboratory Division Publications Report, *Electronic Labelling Guidance*, Publication 748748 (May 9, 2014), available at <https://apps.fcc.gov/eas/comments/GetPublishedDocument.html?id=369&tn=716718>.

TIA submits the following additional input on Draft KDB 748748:

Location of Issue/Input	Section Name	Issue, Proposed Change, and Rationale
<p>Section II(b)(iii) [pg. 3]</p>	<p>Guidance for devices with integrated screen using e-label; Access to the required information on the e-label</p>	<p>Section II(b)(iii) states that “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.”</p> <p>TIA urges for flexibility in communicating how to access required labeling information and urges the following alteration to Section II(b)(iii) [added text is <b>bolded</b>, deleted text is <del>struck through</del>]:</p> <p>“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. <b>Alternatively,</b> <del>t</del>The access information can be made available on the product related website.”</p>
<p>Sections II(c) and II(d)(ii) [pg. 3]</p>	<p>Guidance for devices with integrated screen using e-label; Removable Adhesive Labeling for Importation and Purchasing</p>	<p>Section II(c) states that “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.”</p> <p>Section II(d)(ii) states that “Product packaging material must display the FCC ID and, if applicable, the Doc logo as required by the applicable rules.”</p> <p>We urge the FCC to confirm our understanding that either the use of a removable adhesive label <i>or</i> the use of packaging material are adequate means to communicate labeling information at the time of import or purchase when eLabeling is employed. Specifically, TIA believes that the FCC intends for Section II(c) to address products that are imported or purchased without product packaging, and we agree that under these circumstances a removable adhesive label will communicate important labeling information to customs agents, consumers, and other stakeholders. Further, TIA believes that the FCC intends for Section II(d)(ii) to address new products that are packaged at the time of import or purchase through product packaging materials alone.</p>
<p>Section II(d)(iv) [pg. 3]</p>	<p>Guidance for devices with integrated screen using e-label; Other considerations</p>	<p>To help with clarity, TIA recommends deleting the words “into placing the information” from the first sentence.</p>

We respectfully request that OET Labs consider the above comments in finalizing this KDB. Please contact us if we can be of more assistance.

Respectfully submitted,

**TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

By: /s/ Brian Scarpelli

Brian Scarpelli  
Director, Government Affairs

**TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

1320 Court House Road  
Suite 200  
Arlington, VA 22201  
(703) 907-7700

June 13, 2014