

From: oetech@fccsun27w.fcc.gov  
To: timothyjohnson@comcast.net  
Subject: Response to Inquiry to FCC (Tracking Number 771240) (TCB)



**Inquiry:**

---Reply from Customer on 08/18/2009---

Thank you for your response. However this response only addresses "in lieu of a paper manual" which suggests only when the paper manual is provided in alternative forms. The basic concern is not addressed. The concern is IF there is a paper manual provided, can you still only reference the compliance information in an alternative location. In this case a PAPER manual (70 page manual) is provided, but contains the following info: "For Customers in the United States: Please see the XXX User's Guide at www.xxxxx/support for the FCC Compliance Information Statement (CIS)." Does the FCC allow this?? The client has referenced the fact that the FCC allows the manual to be in alternative forms, that they have been doing this for several years, and that other TCB's have not had a problem with this fact. However it has been my understanding (and others at ATCB) that the phrasing in the rules regarding this mentions "ONLY in a form other than paper". Therefore if a paper manual is also available and provided with the device, the phrasing of the FCC rules implies that compliance information must be in the paper manual. However as shown above, only a reference to another location is given. Please explain if this is acceptable. Thank You, Tim Johnson

**Response:**

Yes for unlicensed devices we allow everything that should go into the users manual to be placed on an electronic resource including a reference to a web site. However, the policy still applies, that required labels and information that should go on the device must do so unless the unit is too small to display such.

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**Inquiry:**

We have reviewed a device that the FCC 2 part statements are NOT on the label (but the device are generally smaller than palm of the hand). The PAPER users manual provided does not provide the 2 parts statements, nor the information required by 15.21 or 15.105. The PAPER manual is an actual 70 page manual (they call it a Product Guide but is obviously a fairly complete manual) in various languages and not just a simple one page installation. However the client is responding that all the information is found on their web site, does not need to be in the manual, and they have been doing this for several years in manuals reviewed by other TCB's. The Paper manual actually contains the following info: For Customers in the United States: Please see the XXX User's Guide at [www.xxxxx/support](#) for the FCC Compliance Information Statement (CIS). Does the FCC allow this?? The information given in several sections of part 15 regarding manuals in alternative forms seems quite clear when it states: In cases where the manual is provided only in a form other than paper, such as on a computer disk or over the Internet, the information required by this section may be included in the manual in that alternative form, provided the user can reasonably be expected to have the capability to access information in that form. This appears to allow you to place it in the alternative form such as the internet when a paper manual does NOT exist. This would appear to imply that when a paper manual DOES exist, that the information must be placed in the manual first. However, does the FCC accept a paper manual where it only directs you where to access the FCC compliance information (i.e. reference to a web site for obtaining this information)?? Is the above allowed? Thank You, Tim Johnson

**Response:**

First let me address the size of the device. We do allow the statement to be placed in the user's manual if the device is truly too small. The Commission does not consider the device to be too small simply because the other countries' labels are taking us all of the room. We do allow the user's manual to be on a disc in lieu of a paper manual and for unlicensed devices only, the users manual can be referenced to an Internet web site. See 47 CFR 15.105(e).

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