



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

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ELECTRONIC LABELING GUIDANCE

I. INTRODUCTION

Equipment subject to 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 Similarly, devices subject to Declaration of Conformity (DoC) are required to be uniquely identified.² The rules 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.³ 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.⁴ The rules already permit devices approved as software-defined radios and modular transmitters to display compliance information electronically through a display where available.⁵

This document provides guidance on how devices with an integrated display screen can 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 or DoC 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 an integrated display.

¹ See 47 C.F.R. § 2.925 (a).

² See 47 C.F.R. §2.1074

³ See 47 C.F.R. § 2.925(d).

⁴ See 47 C.F.R. § 2.925(f).

⁵ See 47 C.F.R. §§ 2.925(e) and 15.212 (a)(1)(vi)(B) and KDB Publication 442812, SDR Apps Guide.

II. GUIDANCE FOR DEVICES WITH INTEGRATED SCREEN USING E-LABEL

A. Information to be displayed

1. The FCC ID and/or the Declaration of Conformity (DoC) logo (if applicable).
2. 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.

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

1. Users must be able to access the information without requiring special access codes or permissions and, in all cases the information must be accessible in no more than three steps in a device's menu.⁶
2. Devices must not require special accessories or supplemental plug-ins (*e.g.*, the installation of a SIM/USIM card) to access the information.
3. Users must be provided specific instructions on how to access the information. The instructions must be included in the User's manual, operating instructions, insert in the packaging materials, or other similar means.⁷ Alternately, the access information may be available on the product related website with instructions on how to access the website provided in the packaging material.
4. 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. 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. For devices imported in bulk and not packaged individually, a removable adhesive label or, for devices in protective bags, a label on the bags 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. For devices imported already in individual packages ready for sale, the information may alternatively be provided on the package. It shall contain:

1. The FCC ID and/or the DoC logo (if applicable); and
2. 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

1. The above information must be programmed by the responsible party and the information

⁶ The information can be in the firmware or software menus provided it is easily accessible and cannot be modified by the user.

⁷ Information provided with the packaging material can be provided on the bags in which the device may be packed or with paper leaflets in the packaging material.

must be secured in such a manner that third-parties cannot modify it.

2. 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 47 C.F.R. § 20.19.
3. E-label displays may include regulatory information required to be placed in the User's Manual or on the packaging as required by the rules. The following considerations must be taken into account for such information distribution.
 - a. 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.
 - b. 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.
4. Products subject to both 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.

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.⁸ The general guidance for all transmitters discussed above also applies to such devices. In addition, the following apply:

1. 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 application for equipment authorization for such modules must include a description of the secure electronic exchange protocol and the security of such arrangement.⁹
2. 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".
3. 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.

⁸ See KDB Publication 996369, Module Certification Guide, for further guidance on certified transmitter modules.

⁹ The module must bear a label with its own FCC ID unless it also has an integrated display.