ELECTRONIC LABELING GUIDANCE

1. INTRODUCTION

This document provides guidance for electronic labeling (e-labeling, e-label) for devices with an integrated electronic display, or those devices that only operate in conjunction with another associated product that has an electronic display. Such devices may electronically display the required regulatory information in lieu of a physical label. This guidance applies to all qualifying devices subject to either the certification or the Supplier's Declaration of Conformity (SDoC) equipment authorization procedures, or both. This includes software-defined radios, modular transmitters, and host products containing modular transmitters. This document supplements the basic guidance for labeling and user information given in KDB Publication 784748 D01.

2. PRODUCTS QUALIFYING FOR E-LABELING [1]

Examples of typical products that have a built-in physical (non-removable, non-detachable) integrated-display include:

- Smartphones
- E-readers
- Notebook computers
- All-in-one desktop computers
- Tablet computers
- Internet radios with digital display

Products without an integrated display but that still qualify to use e-labeling include:

(1) Products that display content via direct connection to a television, monitor, or similar devices. Examples include set-top boxes, game consoles, media streaming products, desktop personal computers.

(2) Products that are required to work in conjunction with another product that has a display, such as a smartphone, laptop computer, desktop computer, or a dedicated companion unit.[2]

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[1] See 47 CFR § 2.935(a).

[2] A companion unit is a device with a display that is used to activate, query, control, configure, and/or operate the RF device (product).

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The connection between the product and other associated product must be capable of functioning locally[3] and under the control of the end user. Examples include:

- Access point or Internet-Radio player without a display, accessible locally via smartphone or computer browser through a wired or wireless local area network, or via Bluetooth or Wi-Fi.

- Wearable product without a display: e-labeling allowed if smartphone, tablet, etc., is required for normal operation.

- Baby monitor with dedicated companion unit with a display.

- Baby monitor with a connection to a smartphone or Personal Computer via Wi-Fi or Bluetooth.

- Baby monitor that operates with a browser on a smartphone, Personal Computer via wired or wireless local area network, or via Wi-Fi or Bluetooth.

- Wireless sensors that connect to a dedicated cloud-based server accessible by account users, capable of retrieving and displaying the regulatory information of the wireless sensor (product).

3. INFORMATION THAT CAN BE DISPLAYED ELECTRONICALLY

The FCC Identifier (FCC ID), any warning statements, or other information that the Commission's rules would otherwise require to be shown on a physical label that is attached to the device can be provided using e-labeling.[4]

The following information must still be provided by physical labels on the device:

- Section 95.2993 – mandatory labeling requirements and warnings for 406 MHz personal locator beacons;

- Section 95.2393 – notice of prior coordination requirement for wireless telemetry devices;

- Section 95.2593 – non-interference warnings and serial number identification for MedRadio equipment;

- Section 80.1061 – requirements for Emergency Position Indicating RadioBeacons;

- Section 87.199 – requirements for Emergency Locator Transmitters; and

- Instances where documents incorporated by reference in the Commission rules contain a physical labeling requirements.

Any information required by other rules to be provided in a physical form (*e.g.,* included in the instruction manual, on a paper insert, displayed on the physical packaging or signage) must still be included with the device.

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[3] The requirement that it must be capable of functioning locally does not mean that it is prohibited from also functioning remotely.

[4] See 47 CFR § 2.935(b).

4. ACCESS AND INSTRUCTIONS TO DISPLAY REGULATORY INFORMATION

4.1 User Steps to Access Information

Users must be able to access the regulatory information without requiring special access codes or permissions, and in all cases the information must be accessible in no more than three steps from a product's main or home menu.[5] An example access process is as follows.

Starting from Main or Home Menu:

Step 1 – accessing submenu (for example, "Settings")

Step 2 – access submenu (for example, "Legal and Regulatory")

Step 3 – access submenu (for example, "Regulatory", where applicable regulatory information is displayed)

4.2 Products must not require special accessories or supplemental plug-ins *(e.g.*, the installation of a SIM/USIM card) to access the information.

Instructions must be provided with the product at the time of purchase, in the user manual, operating instructions, packaging material, quick guide pamphlet, etc. Alternatively, a product-related website is permitted, if a reference (URL) to obtain the website information is provided at the time of purchase in the user manual, operating instructions, packaging material, quick guide pamphlet, etc.

Access to regulatory information must be provided without special codes, accessories, or permissions beyond the normal security protection to unlock the screen, sign-in page, or overall product access.

4.3 Readability of Regulatory Information

The FCC ID, warning statements, or other information must be displayed electronically in a manner that is clearly legible without the aid of magnification.[6]

4.4 Regulatory Information must be Secure

Both regulatory information and dedicated exclusive application(s) or script(s) must be secured and implemented in a factory-set-unalterable format.[7]

The regulatory information must be capable of being retrieved and displayed locally, and under the control of the end user in possession of the product.

The method must be secure, such that the application or script ensures that the regulatory information correctly displayed.

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[5] See 47 CFR § 2.935(c). Displaying FCC regulatory information, especially the FCC ID, on a locked screen or sign-in-screen prior to authentication, is permitted to facilitate identification but is not required.

[6] See 47 CFR § 2.935(d).

[7] See 47 CFR § 2.935(e).

4.5   Physical and Temporary label for Purchasing and Importation

When e-labeling is used, a physical temporary label is also required on the product, or a label on the packaging, at the time of importation, marketing, and sales.[8] The physical label can be a summary version of the required regulatory information, such that the product can be identified as complying with the FCC's equipment authorization requirements. The information may simply be the FCC ID for products subject to certification.

Products imported that are already packaged for sale and have a physical temporary label will satisfy this requirement. However, for products imported in bulk and not packaged individually, it is acceptable to use a temporary removable adhesive label on the product, or temporary or permanent labels on the shipping packaging or protective bags. Any removable adhesive label shall be of a type intended to survive normal shipping and handling.

4.6   Additional Considerations

Modular transmitters without an integral display must still have a physical label with the FCC ID.

Host products utilizing a module or modules that have a built-in integral (non-removable) display, or operate in conjunction with another associated product that has an electronic display (Section 2), may use the host display screen to display "Contains FCC ID(s). In addition, host products are allowed to use e-labeling for the other FCC regulatory information (*i.e.,* SDoC or certification) associated only with the host.

For software-defined radio (SDR) devices, all of the e-labeling conditions described in this document apply.

Any product that requires labelling of multiple FCC ID(s) (or multiple "Contains FCC ID) that elects to use e-labeling shall not use e-labeling for a portion of the FCC IDs and physical labels on the outside of the product for the reminder of the FCC IDs. If any FCC ID physical label is used on the outside of the product, then all the FCC IDs applicable must be physically labelled on the outside of the product.

CHANGE NOTICE

04/09/2018: 784748 D02 e labeling v02 replaces 784748 D01 e labeling v01. Changes have been made to reflect changes in the rules in accordance with FCC 17-93.

04/06/2020 784748 D02 e labeling v02r01 replaces 784748 D01 e labeling v02. Minor clarification has been added to .section 4.6 for products with multiple FCC IDs.

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[8] See 47 CFR § 2.935(f).