



4045-A Campbell Ave.
Menlo Park, CA 94025

1/15/2016

Attention: Application Examiner

RE: Request for Labeling and FCC ID display exemption
Applicant: Earlens Corporation
FCC ID: 2AGDU-EL1

To Whom It May Concern:

Request is hereby submitted by Earlens Corporation to exempt the Audio Processor device for the referenced FCC identifier from requirements pertaining to including a label and displaying the FCC identifier on the device itself (Section 2.925, Section 2.926) Earlens Corporation, would like to include the FCC identifier for the device in the associated User Manual only.

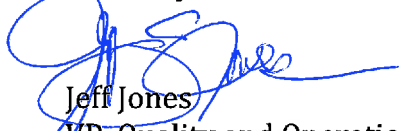
Rationale for request for exemption:

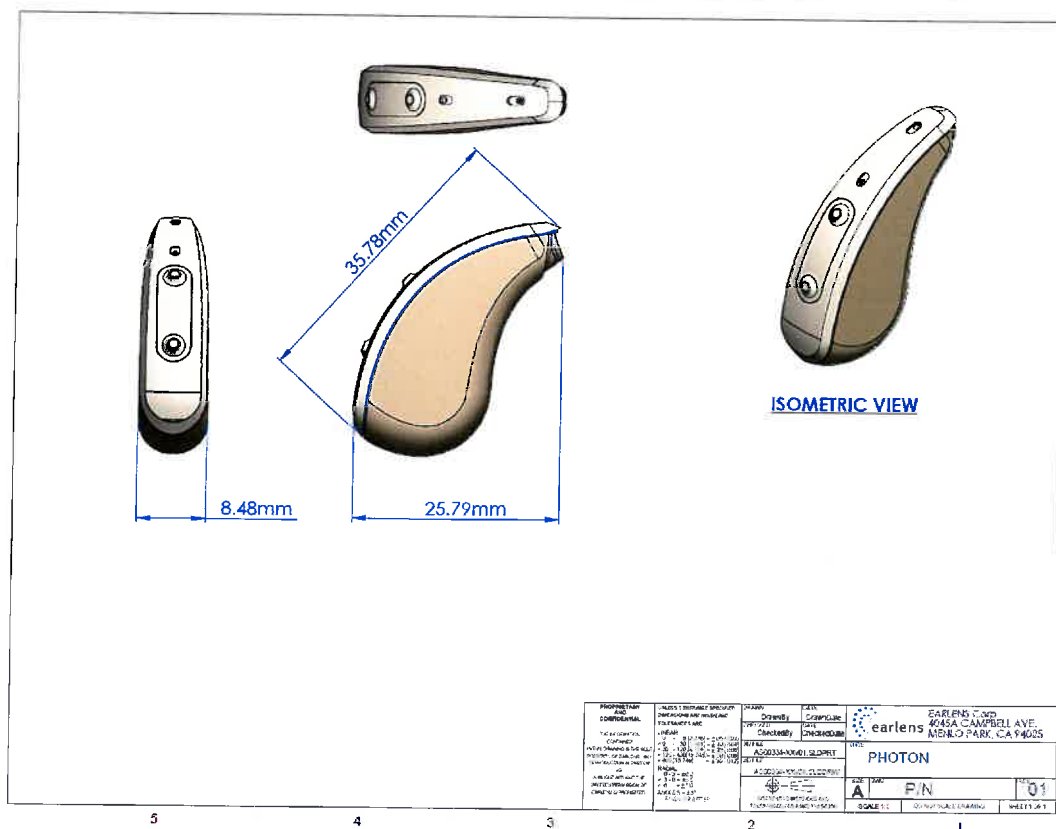
- The top cover and the bottom housing of the device are designed to be removable without using any tools. See attached photo of disassembled device with bottom housing on the left, electronics assembly in the center and top cover on the right.
- Because there are no permanent surfaces on the housing, the requirements defined in the 784748 D01 Labelling Part 15 & 18 Guidelines, Section 4. Label Location for Part 15 and 18 Devices do not apply to our design.
- We believe the products referenced below constitute a precedent to our request.
 - Resound X26BE70
 - Starkey EOA-IRIS-HA

In support of our argument please refer to attached drawings.

If you have questions or need further information, please contact the undersigned.

Sincerely,


Jeff Jones
VP, Quality and Operations
Earlens Corporation



Krishna Vemuri Intertek

From: oetech@fccsun27w.fcc.gov
Sent: Monday, February 08, 2016 12:20 PM
To: Krishna Vemuri Intertek
Subject: Response to Inquiry to FCC (Tracking Number 263437) (TCB)

Importance: High

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Office of Engineering and Technology



Inquiry on 12/21/2015 :

Inquiry:

The client is requesting Permanent confidentiality for the User Manual.
In addition he is requesting to put the FCC ID in the User Manual only, not on the device.
Please see the justification on the attached documents.

Thank you
Krishna

FCC response on 12/24/2015

In order for the user manual to be held permanent confidential, the grantee would need to require a Non-disclosure agreement (NDA) with all purchasers. Please provide a NDA which would list the user manual as required to be held confidential with all purchasers.

With regard to the FCC ID on the device, it is unclear what the dimensional units are on the exhibit provided. Also, indicate whether or not there will be any markings or notices at all on the outside of the device and if so, provide photo's of them.

---Reply from Customer on 01/21/2016---

The client canceled his request about permanent confidentiality for user manual.
With regard to the FCC ID, he submitted additional justification.

---Reply from Customer on 01/21/2016---

The client canceled his request for permanent confidentiality of the user's Manual.
With regard to FCC ID on the Manual, the client submitted additional justification.

FCC response on 01/22/2016

There appears to be enough space on the device specifically on the bottom side which has markings on it. Lack of space is not justified when other markings are on the device. It appears the FCC ID can be placed next to or in lieu of one of the other markings.

---Reply from Customer on 02/02/2016---

There is no permanent part on the device. All part are movable, i.e. can be opened without any tools, but only with fingers.

Please review again the attached letter and consider that it is only one possibility to meet FCC requirements - to write the FCC ID in the user manual.

---Reply from Customer on 02/02/2016---

There is no permanent part on the device. All part are movable, i.e. can be opened without any tools, but only with fingers.

Please review again the attached letter and consider that it is only one possibility to meet FCC requirements - to write the FCC ID in the user manual.

FCC response on 02/04/2016

The FCC identifier can be placed in the area where there is the "Earlens" and some serial number. It cannot be justified that it cannot be done when it has been done albeit with other markings or when other markings take up the space.

---Reply from Customer on 02/05/2016---

Please consider this application to fall under the exemption of KDB 784748 D01, specifically the statement, "The label or statement shall be etched, engraved, stamped, indelibly printed, or permanently affixed to a permanently attached part of the equipment, and be visible at the time of purchase on the exterior of the equipment enclosure".

All sides of the enclosure are designed to be removed from the main PCB for the following reasons:

1. The doctors and audiologists have to remove the cover to program the parameters customized for each patient. Our solution requires different parameters for different patients.
2. The programming connector is inside of the enclosure.

The enclosure can be disassembled without the use of any tools; therefore, there are no parts of the enclosure that are permanently attached to the main PCB. The enclosure is held together by compression clips that are molded into the enclosure edges.

Furthermore, the curved nature of the enclosure will not allow us to print the FCC ID on the remaining space next to the existing markings which are there to meet the traceability requirements of the Food and Drug Administration (FDA).

A letter from the applicant is included with this response that explains this request in more detail.

FCC response on 02/08/2016

The applicants letter and justification is acceptable. The FCC ID label can go in the manual for this device.
Thanks.

Attachment Details:

[Request for confidentiality](#)

[FCC Label justification](#)

[Justification regarding FCC ID in the Manual](#)

[Justification letter for ID Label waiver](#)

Do not reply to this message. Please select the [Reply to an Inquiry Response](#) link from the OET Inquiry System to add any additional information pertaining to this inquiry.