



23-JUN-2026

Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046
USA

Subject: FCC Labeling and User Information Justification
Applicant: Emm Technology Ltd
FCC ID: 2BQACEMM01
Model number/name: EMM01

To whom it may concern

The Emm Smart Menstrual Cup (Model EMM01) is a Bluetooth Low Energy (BLE) enabled menstrual cup intended for intravaginal use. The device is manufactured from flexible medical-grade silicone and incorporates embedded electronics and sensors for menstrual fluid volume measurement.

Pursuant to FCC KDB 784748 D01 General Labeling and Notification Guidance, the applicant respectfully requests acceptance for alternative labeling and compliance information placement.

Placement of the FCC ID and FCC compliance statements directly on the device is impracticable for the following reasons:

1. The device has a continuously curved geometry with no suitable flat surface capable of accommodating readily legible regulatory markings.
2. The available external areas, including the stem portion, are too small to accommodate the FCC ID and required compliance statements in a font size that remains readily legible, as required by FCC labeling guidance.
3. The device is manufactured from flexible medical-grade silicone, which limits the feasibility of applying durable and clearly readable permanent markings.
4. The product is intended for intravaginal use. Placement of regulatory markings on surfaces intended for direct bodily contact is undesirable from both a usability and user comfort perspective.
5. The device does not incorporate a display and therefore electronic labeling (e-labeling) is not available.

In accordance with FCC KDB 784748 D01, the FCC ID is provided in the user manual and on the retail packaging of the device.

The applicant further notes that, due to the same physical and use-related constraints described above, placement of the FCC Part 15.19(a)(3) compliance statement directly on the device is likewise impracticable.

The user manual supplied with the product includes the FCC Section 15.105(b) Class B digital device statement. As indicated in FCC KDB 784748 D01 General Labeling and Notification Guidance, inclusion of the Section 15.105(b) statement in the user manual satisfies the applicable user information requirements, and it is therefore not necessary to additionally provide the Section 15.19(a)(3) statement within the user manual.

The retail packaging includes the FCC ID (2BQACEMM01) together with the FCC Part 15.19(a)(3) compliance statement. Accordingly, the required FCC compliance information is provided through the user documentation and product packaging rather than on the device itself.

The applicant therefore believes that the proposed labeling and user information method fully complies with the alternative labeling provisions of FCC KDB 784748 D01 General Labeling and Notification Guidance and respectfully requests acceptance of this approach.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'SDawson', written over a horizontal line.

Name: Sophie Dawson
Job Title: Senior Quality Engineer