



Justification for the module itself not having label

KDB 784748 D01 Labelling Part 15 & 18 Guidelines v08 section 2.2 (as shown below) provides guideline about labelling requirement of the module.

2.2 Certification

If the device is subject to Certification: (1) Section 2.925 contains information on identification of the equipment; (2) include a label bearing an FCC Identifier (FCC ID) (Section 2.926) and (3) include the appropriate compliance statement in Section 15.19(a). If the labelling area is considered too small and therefore it is impractical (smaller than the palm of the hand) to display the compliance statement, then the statement may be placed in the user manual or product packaging. However, the device must still be labelled with the FCC ID. If the device is unquestionably too small for the FCC ID to be readable (smaller than 4-6 points), the FCC ID may be placed in the user manual. However, it must be determined that the device itself is too small – the label area allocated to the FCC ID may not be reduced because of over crowded identification of other product and regulatory information. Justification for placing the FCC ID in the manual must be submitted with the initial application for certification for review and approval.

The overall dimension of the module is 12.9mm (width) x 23.00mm (length). The PCB Trace Antenna occupies about 6.00mm along the orientation of length. Having label in this area is prohibited due to impact on antenna performance. Hence, effective overall dimension of the module that can be used for placing label is 12.9mm (width) x 17.00mm (length). This information is provided in various documents such as Technical_Description_Ver1.pdf. Module is definitely smaller than palm of the hand and hence it is not possible to have compliance statement. However, such statement is placed in user manual of the module (User_Manual_Ver1.pdf – section 5 and section6). Regarding label on the module itself, the word FCC ID: DZO-OSREFRMG13P in font size 4 takes up about 19mm. The module's effective size is 17mm in length and width is only 12.9mm. Hence, it is not possible to have label with FCC ID on the module itself.

Client's signature



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