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To Whom It May Concern:

Re: Request for exception to apply FCC/ISED markings on Tot Tag 2 (FCC ID: JQ6-TT2)

Tot Tag 2 (TT-2) is RFID/RTLS tag developed by HID Global is purposefully designed for use on patients in healthcare settings. The purpose of the tag is to prevent abduction of the newborn baby, infant or toddler from the hospital.

The size, form factor, and material selection of the tag are optimized to ensure the best possible fit for its intended use case. However, these design choices create challenges when it comes to applying markings to the tag, such as the FCC ID and ISED ID.

- Attaching a label to the outside of the enclosure poses risks, as the tag undergoes frequent sterilization (every 1-2 days) with aggressive antiseptic chemicals. This could cause the label to peel off and hospitals prohibit such labels on products due to the choking hazard they present to infants and toddlers.
- Placing a label inside the transparent enclosure is not feasible. The bottom of the enclosure—where the label would typically be placed—is made of a material designed to allow infrared radiation to pass through without attenuation, as the TT-2 tag uses infrared sensors to detect when it is applied to a patient (see Theory of Operation document). This material cannot be produced as fully transparent, making an internal label impractical.
- The top of the tag is reserved for the Serial Number, which must remain highly legible and visible during normal use, free from obstructions or potential misinterpretation. To prevent label peeling off, the Serial Number is laser-etched. However, laser etching has limitations: the minimum font size is constrained to ensure readability and etching the FCC/ISED information is not viable due to the material properties, the volume of the text required and the risk of users confusing those markings with the Serial Number.
- Alternative marking methods, such as pad printing or silk-screening, are unsuitable for either the Serial Number or FCC/ISED information, as they would wear off quickly under daily sanitation with aggressive chemicals.

Given these restrictions HID Global is requesting the exception from the requirement to apply FCC/ISED marking on Tot Tag 2 (TT-2), but to apply these markings on packaging and in product documentation as per KDB 784748 D01 guideline document.

Regards,

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