



10/7/2024

Federal Communications Commission  
7435 Oakland Mills Road  
Columbia, MD 21046

Subject: Request for Labeling Exemption

To Whom It May Concern:

The purpose of the letter is to request an FCC labeling exemption for FCC ID:  
2BLGWZOHN-1.

We believe that the product qualifies for a labeling exemption according to FCC KDB 784748 D01, Section 3: Certification, "When the device is so small or for such use that it is impracticable to label with a font size that is four points or larger (and the device does not utilize electronic labeling), then the FCC ID shall be placed in the user manual. The FCC ID shall also be placed either on the device packaging or on a removable label attached to the device."

Additionally, it is our position that the product also qualifies for exemption under FCC KDB 784748 D02, Section 2: Products Qualifying for E-Labeling, "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."

To support the product meets both criteria, please note the following:

1. Breggz custom made in-ear-monitors are unique biometric 3D shape based on every customer's ear scan. The surface facing outwards from the ear are equipped with microphones and touch interactive surface and will not function with a laser engraved, etched label, or molded raised or indented text. The surface facing inward will be inserted into the interior of the ear with each use, and over time, it is likely that a raised or etched label would deteriorate to the extent that the label would become unrecognizable.
2. Breggz in-ear monitors are required to work in conjunction with another product that has a display (ie: a smart phone). The in-ear monitors pair to a custom-made mobile App "Breggz – control app" The Breggz App is specifically designed to work with the in-ear monitors and will not work with other devices. In this app the unique product numbers of the earphones are visible, this makes it easy to always identify the unique

set of Breggz in-ear monitors via the Breggz App, where links to User Manuals and Quick start guides, which contain the required regulatory information, are also available.

3. Breggz in-ear monitors are provided with an online QuickStart guide and User Manual which contain the required regulatory information.
4. All regulatory information is non-modifiable and cannot be updated or changed by the user or software/firmware updates.
5. A permanent label containing the required EMC/Radio device label will be affixed to the product package prior to shipment.

Thank you for your consideration.

Sincerely,

Ondertekend door:  
  
90207C0DD2084AA...  
Jeroen van Els  
CEO

( ) breggz™