

Response to Inquiry to FCC (Tracking Number 711138)

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Inquiry on 11/08/2023 :

Inquiry:

Dear Sir/Madam?

Recently, we have discussed issues related to 15.19 statements with some manufacturers.

The issues discussed are as follows:

The size of one product is 210*110*65mm, and the device can bear the 15.19 statement and the device does not have a display that can show electronic labeling. But for the sake of aesthetics or to include certification information and logos from other countries, is it feasible not to put the 15.19 statement on the label?

Some manufacturers and I agree that regulations part 15.19 must be followed. For products that are large enough, the 15.19 statement should be placed on the label.

Some manufacturers listed many products already on the market, such as notebooks, mobile phones, and some speakers, but did not see 15.19 statements on the products. And the sizes of these products are large enough, so the 15.19 statement can definitely be placed on the main body label. Therefore, they believe that there is no need to put the 15.19 statement on the product label. Regardless of the size of the product, the 15.19 statement can be directly placed on the product packaging and manual.

We have also consulted TCB, and they also said that the products currently undergoing certification, such as notebooks, do not put the 15.19 statement on the product itself.

Therefore, I am here to seek your help and please help us answer our doubts.

Look forward to your feedback soon.

Best Regards,

§
15.19 Labeling requirements.

(5) When the device is so small
or for such use that it is impracticable to label it with the statement

specified under [paragraph](#)

(a) of this section in a font that is four-point or larger, and the device does not have a display that can show electronic labeling, then the information required by this paragraph shall be placed in the user manual and must also either be placed on the device packaging or on a removable label attached to the device.

FCC response on 11/08/2023

Hello,

The labeling policy differs between the FCC ID and the 15.19 statement.

- The 15.19 rule says that if it is too small or not practical, you can put the statement in the manual and packaging. KDB policy 784748 D01 General Labeling and Notification APPENDIX A also says .
- When the device is so small or for such use that it is impracticable to label it with the required compliance statement, the Section 15.19(a) statement shall be placed in the instruction manual.
- What is impractical? The FCC is more liberal with the 15.19 (a) statement, allowing the manufacturer to define what is practical. Practical includes the product's aesthetic value or company brand image.
- Suppose an instruction manual is not provided or is only available electronically.
- In that case. The Section 15.19(a) statement shall also be placed on the device packaging, paper insert, or on a removable label attached to the device. 2. The FCC is more liberal with the 15.19 (a) statement allowing the manufacturer to define what is practical. Practical includes the product's aesthetic value or company brand image.

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