
From: oetech@fcc.gov
Sent: Friday, December 2, 2022 3:09 PM
Subject: Response to Inquiry to FCC (Tracking Number 163019)

EXTERNAL EMAIL: Be careful with attachments and links.

Inquiry on 12/01/2022 :

Inquiry:

Lincoln Electric is seeking pre-approval to place the FCC Identification information in the host product literature and on the host label only. Due to the size of the module it is impractical to place a label on the chip itself. Lincoln Electric will be seeking LMA as they do not intend to sell the module to third parties and installation will be only in their host products. Images of the module have been submitted to show size, a sample host manual has the contains information on page 6 and an image of the helmet display screen have been provided to support Lincoln Electrics labelling intent. Please let us know if this will be acceptable.

FCC response on 12/02/2022

Sorry I do not understand your question. Module labelling and Host labelling are two separate labels.(one goes on the module (FCCID XYZ) .the other goes on the Host (Contains FCC IDL XYX)

1.However, for the module , the module itself qualifies for meeting the small size rule 47 CFR 2.925(f)

·“The FCC Identifier including the term “*FCC ID*” shall be in a size of type large enough to be readily legible, consistent with the dimensions of the equipment and its label. However, the type size for the FCC Identifier is not required to be larger than eight-point. If a device is so small that it is impractical to label it with the FCC Identifier in a font that is four-point or larger, and the device does not have a display that can show electronic labeling, then the FCC Identifier 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.” Since this is in the rules, it is not necessary to be a limited modules as long as the FCC ID is in the integration instructions) Not the host manual) .

2.The host labelling is a separate requirement. The host does not appear to qualify for 47 CFR 2.925. But does appear to qualifies for electronic labeling (stating Contains FCC IDL XYX) or use physical label ” Contains FCC IDL XYX” .

Attachment Details:

[Display Screen](#)

[Host product manual](#)

[Module Image](#)

[Agent Authorization](#)

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