

devices currently can make use of electronic labeling.² This has proven to be a success in allowing SDR approved devices to be added to a host device because no additional outside label is required. As a result, changes to the radio, including FCC approved changes that may alter the FCC ID, allow the user or manufacturer to update the radio approval information with minimum impact or cost. In effect, the combination of the SDR rule and electronic labeling allows the radio to evolve over time, and by displaying the FCC ID electronically, the device is always equipped with the correct identification.

Today, the great majority of wireless devices approved by the FCC must use physical labeling. As the Commission is aware, physical labeling can wear off and wear out, or in some cases can be tampered with to obscure the identification number. What the Commission may be less aware of is that physical labeling is costly to maintain in today's global supply chains where equipment is being manufactured for sale in multiple jurisdictions. Once an item is physically labeled, manufacturers must consider the need to physically re-label product if there is a need to change the shipping destination.

Cisco now believes it is time to expand the concept of electronic labeling to other, non-SDR wireless devices. As TIA explains in its petition, modern form factors and the electronic displays on radio devices are better suited to electronic labeling than physical labeling. Information on the FCC ID could be displayed at startup or include a softkey to retrieve the information as needed. For consumer devices, consumers do not look inside the battery enclosures of their device for information – they look to the menu to find a “settings” or similar key to find information about the devices. Cisco believes that a more consumer-friendly

² 47 C.F.R. Section 2.925 (e). A Software Defined Radio may be equipped with a means such as a user display screen to display the FCC identification number normally in the nameplate of label..

approach is to place the FCC ID with the other data about the device, in electronic form accessible to the user.

Electronic labeling should assist the Commission in other ways. For example, with the advent of modular radio design, an electronic label is the best vehicle to ensure that the device is always equipped with the correct labeling. In addition, by using electronic labeling, the Commission could easily verify a FCC ID of a device installed in the field or being operated by a user without having to remove the device from where it is mounted or opening up the device to remove the battery to read the FCC ID.

Cisco urges the Commission to promptly initiate a rulemaking to expand the applicability of electronic labeling to radios that today are subject to physical labeling.

Respectfully submitted,

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