Labeling of Wireless Devices
Prepared by Element Materials Technology

FCC

FCC ID:

47 CFR 2.925(a)(1):  
FCC Identifier consisting of the two elements in the exact order specified in § 2.926. The FCC Identifier shall be preceded by the term FCC ID in capital letters on a single line, and shall be of a type size large enough to be legible without the aid of magnification. Example: FCC ID XXXX123. XXXX—Grantee Code 123—Equipment Product Code

Statement

47 CFR 15.19(a)(3):  
All other devices shall bear the following statement in a conspicuous location on the device: This device complies with part 15 of the FCC Rules. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation.

47 CFR 15.19(a)(5):  
When the device is so small or for such use that it is not practicable to place the statement specified under paragraph (a) of this section on it, the information required by this paragraph shall be placed in a prominent location in the instruction manual or pamphlet supplied to the user or, alternatively, shall be placed on the container in which the device is marketed. However, the FCC identifier or the unique identifier, as appropriate, must be displayed on the device.

User Manual Info

47 CFR 15.21  
The users manual or instruction manual for an intentional or unintentional radiator shall caution the user that changes or modifications not expressly approved by the party responsible for compliance could void the user’s authority to operate the equipment. In cases where the manual is provided only in a form other than paper, such as on a computer disk or over the Internet, the information required by this section may be included in the manual in that alternative form, provided the user can reasonably be expected to have the capability to access information in that form.
RF Safety

For devices operated greater than 20cm from the user, cautionary mobile exposure statement should be in the manual. MPE estimates are required for devices operating greater than 20 cm from the user. Here is an excerpt from OET Guide 65C that describes the requirement:

“For other transmitters which do not normally operate next to persons, such as a wireless LAN transmitter located on a desktop, certain operating and usage instructions may be included in the operator’s manual to caution users to maintain a specified distance from the transmitter to ensure compliance.”

For devices capable of body-worn operation, the user manual must contain statements that describe permissible body-worn operation. SAR Testing is required for devices operating above 25 mW and used closer than 20cm from the user. Here is an excerpt from OET Guide 65C that describes the requirement:

“In order for users to be aware of the body-worn operating requirements for meeting RF exposure compliance, operating instructions and caution statements should be included in the manual. The information should allow users to make informed decisions on the type of body-worn accessories and operating configurations that are appropriate for the device. The following are examples of typical statements that provide end-users with the necessary information about body-worn accessories:

1. For a product that has the potential to be used in a body worn configuration and has been tested and certified with a specific accessory device(s):

   “For body worn operation, this phone has been tested and meets the FCC RF exposure guidelines when used with the (manufacturer name) accessories supplied or designated for this product. Use of other accessories may not ensure compliance with FCC RF exposure guidelines.”

2. For a product that has the potential to be used in a body worn configuration and has not been certified with a specific accessory device(s):

   “For body worn operation, this phone has been tested and meets FCC RF exposure guidelines when used with an accessory that contains no metal and that positions the handset a minimum of (specified distance) from the body. Use of other accessories may not ensure compliance with FCC RF exposure guidelines.”

3. For a product that has the potential to be used in a body worn configuration with future manufacturer designed accessories:

   “For body worn operation, this phone has been tested and meets the FCC RF exposure guidelines when used with a (manufacturer name) accessory designated for this product or when used with an accessory that contains no metal and that positions the handset a minimum of (specified distance) from the body.”
ISED

IC ID and Equipment Label:

RSP 100, Issue 11, January 2016, Section 3.1 and RSS-GEN, Issue 5, October 2018 section 4.1-4.3:

It should be noted that the Product Marketing Name (PMN), Hardware Version Identification Number (HVIN), Firmware Version Identification Number (FVIN) and Host Marketing Name (HMN) are commonly used terms, and are defined in Section 10 of this document.

Every unit of certified product for marketing and use in Canada shall be identified as per these requirements:

The HVIN and ISED certification number shall be permanently indicated on the exterior of the product or displayed electronically according to e-labelling requirements:

- the HVIN and ISED certification number are permitted to be placed on a label, which shall be permanently affixed to the product
- the ISED certification number shall be preceded by “IC:”
- the HVIN is permitted to be listed or placed with or without any prefix (HVIN:, Model#, M/N:, P/N:, etc.)
- the HVIN and ISED certification number are not required to be adjacent to each other

The PMN must be displayed electronically (e-labelling), or indicated on the exterior of the product or product packaging or product literature, which shall be available with the product or online.

The PMN, HVIN and ISED certification number are permitted to be etched, engraved, stamped, printed on the product, or permanently affixed to a permanently attached part of the product.

The PMN, HVIN and ISED certification number indicated/displayed (e-labelling) on any product on the Canadian market must be listed in the REL.

When the FVIN is the only differentiation between different product versions (PMN and HVIN remain identical) listed in the REL within a family certification, the FVIN shall be displayed electronically or stored electronically and be easily retrievable.

In all cases, the PMN, FVIN, HVIN and ISED certification number text shall be clearly legible.

**Note:** The ISED certification number, HVIN, applicable PMN and FVIN are not required to be adjacent to each other.
The certification number is made up of a Company Number (CN), assigned by Innovation, Science and Economic Development Canada’s Certification and Engineering Bureau, followed by the Unique Product Number (UPN) assigned by the applicant. The certification number format is:

IC: XXXXXX-YYYYYYYYYYY

where:

- The letters “IC:” indicate that this is an Innovation, Science and Economic Development Canada’s certification number, but they are not part of the certification number. XXXXXX-YYYYYYYYYYY is the ISED certification number.
- XXXXXX is the CN assigned by Innovation, Science and Economic Development Canada. Newly assigned CNs will be made up of five numeric characters (e.g. “20001”) whereas existing CNs may consist of up to five numeric characters followed by an alphabetic character (e.g. “21A” or “15589J”).
- YYYYYYYYYYY is the Unique Product Number (UPN) assigned by the applicant, made up of a maximum of 11 alphanumeric characters.
- The CN and UPN are limited to capital alphabetic characters (A-Z) and numerals (0-9) only. The use of punctuation marks or other symbols, including “wildcard” characters, is not permitted.
- The HVIN may contain punctuation marks or symbols but they shall not represent any indeterminate (“wildcard”) characters.

If the dimensions of the product are extremely small or if it is not practical to place the label or marking on the product and electronic labelling has not been implemented, the label shall be, upon agreement with Innovation, Science and Economic Development Canada prior to certification application, placed in a prominent location in the user manual supplied with the product. The user manual may be in an electronic format and must be readily available.

User Manual Info:

**RSP 100 Issue 11, January 2016, Section 4 Required Notices to the User**

Radio/broadcast products shall comply with the requirements to include required notices and/or statements to the user of the product for each unit of the product offered for sale. The required notices shall comply with the following requirements:

- The notices shall be as specified in the applicable RSS regulation(s) to the product.
- These notices shall be shown in a conspicuous location in the user manual for the product, or to be displayed on the product — variable formats are acceptable for providing the notices (i.e. in paper form, CD, DVD, or insert with download link on the company’s website).
- If more than one notice is required for multiple product versions, the product version to which each notice pertains should be identified.
The suppliers of radio equipment shall provide the notices and/or statements in both English and French.

In cases where the user notifications are only available in one language (English or French) at the time of the certification process, the applicant shall provide a declaration in writing that the user notices and/or statements to the user of the product will be in both English and French when the product is for sale and/or lease in Canada.

**RSS-Gen, Issue 5, October 2018, Section 6.8 Transmitter Antennas for Licence-Exempt Radio Apparatus**

User manuals for transmitters equipped with detachable antennas shall also contain the following notice in a conspicuous location:

This radio transmitter [enter the device’s ISED certification number] has been approved by Innovation, Science and Economic Development Canada to operate with the antenna types listed below, with the maximum permissible gain indicated. Antenna types not included in this list that have a gain greater than the maximum gain indicated for any type listed are strictly prohibited for use with this device.

Immediately following the above notice, the manufacturer shall provide a list of all antenna types approved for use with the transmitter, indicating the maximum permissible antenna gain (in dBi).

**RSS-Gen, Issue 5, October 2018, Section 8.4 User Manual Notice for Licence-Exempt Radio Apparatus**

User manuals for license-exempt radio apparatus shall contain the following text, or an equivalent notice that shall be displayed in a conspicuous location, either in the user manual or on the device or both:

This device complies with Industry Canada license-exempt RSS standard(s). Operation is subject to the following two conditions: (1) this device may not cause interference, and (2) this device must accept any interference, including interference that may cause undesired operation of the device.

**RSS-Gen, Issue 5, October 2018, Section 2.7.3 Radio Apparatus Containing Digital Circuits (ICES-003)**

Any radio apparatus that is specifically subject to an Industry Canada Radio Standards Specification (RSS) requirement and contains information technology equipment (ITE device) is not subject to the Interference-Causing Equipment Standard ICES-003, provided that the ITE is used only to enable operation of the radio apparatus and that the ITE does not control additional functions or capabilities; otherwise, ICES-003 applies. In both cases, the labelling requirements of the applicable RSS apply, rather than the labelling requirements in ICES-003.
RSS-102, Issue 5, March 2015, Section 2.6

The applicant is responsible for providing proper instructions to the user of the radio device, and any usage restrictions, including limits of exposure durations. The user manual shall provide installation and operation instructions, as well as any special usage conditions, to ensure compliance with SAR and/or RF field strength limits. For instance, compliance distance shall be clearly stated in the user manual. The user manual of devices intended for controlled use shall also include information relating to the operating characteristics of the device; the operating instructions to ensure compliance with SAR and/or RF field strength limits; information on the installation and operation of accessories to ensure compliance with SAR and/or RF field strength limits; and contact information where the user can obtain Canadian information on RF exposure and compliance. Other related information may also be included.

RSS-Gen, Issue 5, October 2018, Section 4.4, Annex B Electronic Labelling Requirements

Devices with an integrated display screen may have the required label information represented electronically in an e-label instead of on a physical label or nameplate. Devices without an integrated display screen may have the labelling information represented through an audio message or a host device display screen connected by a physical connection, Bluetooth, Wi-Fi, or other, if the connection to a device with a display is mandatory for use.

The sections below detail the requirements that apply to e-labelling.

B.1 Information to be displayed

The e-label must display the following regulatory information:
(a) the ISED certification number and the model identification number for radio equipment
(b) any other information required to be provided on the surface of the device, unless such information is permitted to be included in the user manual or other packaging inserts.

The equipment authorization application must clearly include the instructions for accessing regulatory information, as per section B1, stored electronically.

B.2 Accessibility of the e-label

Users shall be provided with clear instructions on how to access the regulatory information stored electronically (e-label). These instructions shall meet the following requirements:
(a) be provided in the user manual, operating instructions or packaging material (e.g. on the bags used to pack the device or on accompanying leaflets), or on a website related to the product
(b) not require the use of special access codes or accessories (e.g. SIM/USIM cards)
(c) not include more than three steps from the device’s main menu

The e-label shall meet the following requirements:
(a) be easily accessible by the user
(b) not be modifiable by the user (e.g. if stored in the firmware or software menus)
B.3 Labelling for importation and purchasing
Products utilizing e-labels are required to have a physical label on the product packaging at the time of importation, marketing and sales. The following conditions shall apply:
(a) For devices imported in bulk (not packaged individually), a removable adhesive label or, for devices in protective bags, a label on the bags is acceptable to meet the physical label requirement.
(b) Any removable label used shall survive normal shipping and handling and must only be removed by the customer after purchase. For devices already imported in individual packages ready for sale, the information may alternatively be provided on the package and shall contain:
   (i) The ISED certification number and the model identification number
   (ii) Any other information required to be provided on the surface of the product unless such information is permitted to be included in the user manual or other packaging inserts.

B.4 Security
The information to be displayed on the e-label, as per section 1, shall meet the following security requirements:
(a) be programmed by the responsible party (e.g. manufacturer)
(b) not be modifiable or removable during the course of normal authorized activities by a third party (i.e. the typical user), such as installing applications or accessing menus

B5. User manual and packaging
All information required to be on the packaging or in the user manual as per the applicable standards (e.g. RSSs) must be provided, even if the user manual and packaging components are provided electronically. Such information may be included in the device’s e-label. The following considerations must be taken into account when providing such information on the e-label:
(a) If the user manual is provided by other electronic (e.g., on CD or online), then as an option the required information may also be provided as part of the e-label.
(b) The e-label format must clearly differentiate between the information required to be on the surface of the device and the information required to be in the user manual or on the packaging.

B6. Devices approved as certified transmitter modules
Devices approved as certified transmitter modules may have their ISED certification number displayed electronically if the module or the host in which it is integrated has a display screen. In such cases, all e-labelling requirements apply.
If the certified transmitter module provides a secure electronic exchange interface with authentication between the host with integrated display and the module to identify the correct ISED certification, then the host may display the module’s ISED certification number on the host’s built-in display. In such cases, the following conditions apply:
(a) The module may be either user-installable or factory-installed.
(b) The application for equipment authorization for such modules shall include a description of the secure electronic exchange protocol and the security of such an arrangement.
(c) The module must bear a physical label with its own ISED certification number unless it also has an integrated display.
If the certified transmitter module does not provide a secure electronic exchange interface with authentication, the host manufacturer may electronically display the module’s ISED certification number on the host by factory-encoding the ISED certification number of the module. In such cases, the following conditions apply:
(a) Factory encoding must be secure and locked by the host manufacturer, and not modifiable by any third parties.
(b) The programmed information must display the ISED certification number of the module, preceded by the words "contains transmitter module", or the word "contains", or similar wording expressing the same meaning, as follows:
"Contains transmitter module IC: XXXXXX-YYYYYYYYYYY"
In this case, XXXXXX-
Australia / New Zealand

Compliance and Labeling information can be found here: