Teleepoch Limited
2/F, R2-A North Gate, Shenzhen High-Tech Industrial Nanshan District, Shenzhen, Guang Dong, China

Date: May 31, 2011

Equipment Authorization Division
Office of Engineering and Technology
Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046

Ref: FCC ID: U46-CDM2080

Dear Sirs:

Cellon Communications Technology (Shenzhen) Co.,Ltd. requests acceptance of the labeling proposal described below for cell phone bearing FCC identifier U46-CDM2080.

The subject cell phone are compact handheld models as shown in figure 1, authorized under 47CFR Part 22H&24E&27L for CDMA mobile services.

Figure 1_FCC ID: U46-CDM2080, Model: CDM2080US

Because the majority of the cell phone housing is composed of display, speaker, operating controls and a removable battery pack, there is extremely limited space available to attach the required label carrying the FCC identifier. Attaching the label to the battery pack is not acceptable because the battery pack is a removable item. For this reason, TeleEpoch Limited proposes placing the label carrying the FCC identifier inside the battery compartment as shown in figure 2.

Figure 2_FCC ID: U46-CDM2080, Model: CDM2080US

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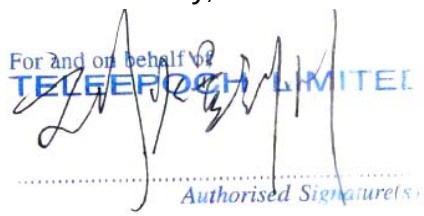
The consumer packaging for these models includes the battery pack as a separate item, NOT installed on the radio. As such, the FCC identifier will be readily visible to the user before the battery pack is installed and whenever the battery pack is removed or replaced. In this location, the label will also be protected from physical abuse and remain readable for the anticipated life of the device.

The consumer packaging for these models is a "gift box" which does not allow the transceiver to be seen at time of purchase. In order to meet the requirements of 47CFR Part 2.925 (d), TeleEpoch Limited will add the FCC identifier " U46-CDM2080" to the outside of the consumer "gift box" packaging.

Thank you for your attention to this matter.

Yours Sincerely,