Correspondence Reference # 37285

Federal Communication Commission Equipment Authorization Division, Application Processing Branch 7435 Oakland Mills Road Columbia, MD 21048

April 2, 2009

To Whom It May Concern

ID Label/ Label Location – Unitron Passport ITE (In-The-Ear)

Pursuant to paragraph §2.925 of 47 C.F.R. the hearing instrument Unitron Passport ITE, which is subject of this filing, shall bear a permanently affixed, readily visible label listing the information as specified in §2.926 and §15.19(a) of the 47 C.F.R. Due to the specific use of the hearing instrument (as shown in figure 1) its external surface is in contact with the user's skin in the ear canal.



Figure 1: Position of the Hearing Instrument on the User

Typically the devices the customer requires the smallest size possible. The very small size prevents the manufacturer from including all the information in a readable & visible state.

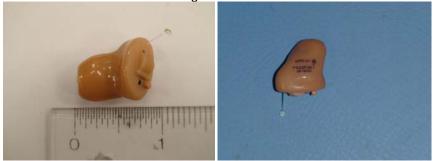


Figure 2: Passport ITE Serial ID Number

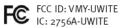
As this device is a medical device the model name and serial number are a priority. In this case the size of the FCC ID will be smaller then 2 points, which does not satisfy the requirements for "readily visible" label as defined in §2.925 (d)(2) and §2.925(g).

As a result of the small size of the devices and pursuant to paragraph § 15.19(a)(5) of 47 C.F.R., the FCC ID and the statement specified in §15.19(a)(3) are placed in the user manual as shown figure 3.

Notices

Notice 1

This instrument is certified under:



This device complies with Part 15 of the FCC Rules and with RSS-210 of Industry Canada. 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. Changes or modifications made to this equipment not expressly approved by Phonak may void the FCC authorization to operate this equipment.

Notice 2

This Class B digital apparatus complies with Canadian ICES-003.

Notice 3

This equipment has been tested and found to comply with the limits for a Class B digital device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference in a residential installation. This equipment generates, uses, and can radiate radio frequency energy and, if not installed and used in accordance with the instructions, may cause harmful interference to radio communications. However, there is no guarantee that interference will not occur in a particular installation. If this equipment does cause harmful interference to radio or television reception, which can be determined by turning the equipment off and on, the user is encouraged to try to correct the interference by one or more of the following measures:

- · Reorient or relocate the receiving antenna
- Increase the separation between the equipment and receiver
- Connect the equipment into an outlet on a circuit different from that to which the receiver is connected
- Consult the dealer or an experienced radio/TV technician for help

32

Figure 3: FCC ID and Compliance Statement – User Manual

Ric Castle Manager, Quality Assurance. Unitron Hearing 20 Beasley Drive, P.O. Box 9017 Kitchener, Ontario, Canada N2G 4X1

Phone: 519 895 0100 Fax: 519 895 0108

Email: ric.castle@unitronhearing.com