

COVER LETTER FOR DD37X LABELLING

28th May 2019

FCC ID: **VC7120-0201**

IC: **8910A-1200201**

Mode HVIN: **DD37X** (Electronic Shelf Label "Chroma 37L")

To whom it may concern.

The proposed solution puts the model identity (HVIN) and manufacturer's logo inside the battery tray floor of the rear mechanical piece, and the FCC ID, together with the PMN on the removable battery cover. This ensures that the text size remains readable.

The following features of the product are offered as mitigating factors for using the removable cover to carry some of the labelling:

1. DD37X is inoperable without the battery cover. The battery contact force is sufficient to push the batteries out of place so that the product has no power. There is no other source of power.
2. DD37X is not a consumer product. It is an industrial product. It is a shelf edge electronic label that is deployed in 1000s in a retail store or industrial facility. They are never used singly. The minimum number sold is 500. If a battery cover is lost on one device – there are hundreds of others at the same location that can be used as reference by the user/installer to identify the product on the FCC websites.
3. The HVIN label is applied to the product body [in the battery tray] as the common unique identifier for both FCC and, if required, ISED.
4. The FCC ID for DD37X is included with the user manual (installation guide) provided.

Sincerely,



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