



TELECOMMUNICATIONS
INDUSTRY ASSOCIATION

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July 23, 2014

The Honorable Bob Latta
U.S. House of Representatives
2448 Rayburn House Office Building
Washington, DC 20515

The Honorable Peter Welch
U.S. House of Representatives
2303 Rayburn House Office Building
Washington, DC 20515

Dear Congressmen Latta and Welch:

The Telecommunications Industry Association (TIA), the leading trade association for global manufacturers, vendors, and suppliers of information and communications technology (ICT), is writing to thank you for your bipartisan leadership in introducing the Enhance Labeling, Accessing, and Branding of Electronic Licenses Act of 2014 (E-LABEL Act), as it would enhance the ability of ICT manufacturers to innovate and compete while increasing access to device information for consumers. TIA has long been the lead voice for the modernization and improvement of device approval processes through such allowances as electronic labeling (eLabeling), both in the United States and internationally.

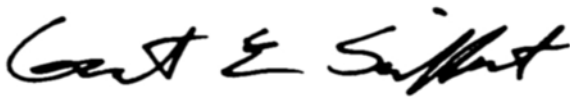
Your legislation recognizes that in order to compete effectively in the increasingly competitive ICT marketplace, manufacturers are progressively looking towards innovative industrial methods that provide a way to differentiate and improve the performance of their products. TIA has long held that the Federal Communications Commission's (FCC) requirement for manufacturers to either etch or print mandatory regulatory markings on the exterior of devices increases costs, limits industrial and aesthetic design options, and ineffectively conveys important information to consumers. This dynamic exists because physical labeling requirements were implemented by the FCC prior to the advent and widespread implementation of the graphical interface and the development of the easy-to-navigate menus of today's devices (smartphones, tablets, etc.). As such, physical device-labeling obligations on equipment requiring FCC approval have become an aging relic of the pre-digital world and are burdensome, expensive, and outdated, and we commend the FCC's recent release of guidance on how devices with an integrated display screen can present the required label and regulatory information electronically in lieu of a physical label or nameplate.¹

¹ FCC, KDB 748748 Electronic Labeling Guidance (Jul. 11, 2014), available at <https://apps.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?id=27980&switch=P>.

We agree with you that eLabeling is the natural progression of device labeling in the age of graphical interfaces, and would provide needed flexibility to device manufacturers. Granting device manufacturers of the ability to use eLabels will ease the technical and logistical burdens on manufacturers while increasing consumer access to important information about their devices--not only the equivalent found on an etching or sticker, but also valuable information about proper device care, recycling programs and warranties. Importantly, your legislation will allow countless American consumers to access easily readable and prominently displayed information about the devices they use every day.

Thank you again for your efforts. TIA appreciates your strong bipartisan commitment and leadership on this legislation, and we look forward to working with you to enact these important changes. For more information, please contact Danielle Coffey at (703)-907-7734 or by email at dcoffey@tiaonline.org.

Sincerely,

A handwritten signature in black ink that reads "Grant E. Seiffert". The signature is written in a cursive, flowing style.

Grant E. Seiffert
President