Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, DC 20554

In the Matter of	)	
	)	
Petition for a Rulemaking to Authorize the Use of Quick Response Codes on Packaging to Convey FCC-Required Regulatory Information for Smart Devices	)	RM No. _____

To: The Commission

PETITION FOR RULEMAKING

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PETITION FOR RULEMAKING

The Mobile & Wireless Forum (MWF),[1] and the Telecommunications Industry Association (TIA)[2] hereby respectfully petition the Federal Communications Commission to initiate a rulemaking proceeding to authorize the use of Quick Response (QR) codes on the outer packaging of smart devices as a means of conveying the regulatory information that the Commission's rules currently require to be displayed in printed form. Petitioners bring this proceeding pursuant to Section 1.401 of the Commission's rules, 47 C.F.R. § 1.401, and Section 4(e) of the Administrative Procedure Act, 5 U.S.C. § 553(e). Under the framework proposed in this petition, the QR code printed on packaging would direct a consumer to a designated online

[1]The Mobile & Wireless Forum (MWF) is an international association of companies with an interest in mobile and wireless communications, including the safe and effective use of mobile devices. Information about MWF and its members is available at www.mwfai.org.

[2] TIA is a U.S.-based trade association representing more than 400 trusted global manufacturers and vendors of telecommunications equipment. TIA members design, manufacture, and manage the world's digital infrastructure and information communications technology ("ICT") devices. TIA is also a standards-developing organization with a more than 80-year history of developing thousands of technical standards that allow ICT equipment and networks to operate efficiently and effectively.

location and, where applicable, to information stored within the device itself, providing access to the FCC Identifier, the Part 15 compliance statement, RF exposure information, Hearing Aid Compatibility (HAC) information, and any other regulatory information that the Commission requires to accompany the device, whether at the time of sale or thereafter.

I. INTRODUCTION AND SUMMARY

The Commission's current labeling rules were developed when product packaging and printed inserts were the only practical means of conveying regulatory information to a purchaser. That premise no longer holds. The E-LABEL Act of 2014[3] and the Commission's implementing rule at Section 2.935[4] recognize that compliance information can be made available electronically through the device itself, and the Office of Engineering & Technology (OET) has issued detailed guidance on how such electronic labeling is to be carried out.[5] The intervening years have demonstrated that QR codes are a reliable, universally understood mechanism for moving consumers from a physical object to current, structured online information. Granting the same recognition to QR codes on outer packaging is the logical next step.

This Petition asks the Commission to open a rulemaking proceeding that would amend Parts 2, 15, 18, and 20 of its rules to permit, at the manufacturer's option, a QR code on the outside of product packaging to satisfy the printed disclosure requirements set out in Sections

[3]Enhance Labeling, Accessing, and Branding of Electronic Licenses Act of 2014, Pub. L. No. 113-197, 128 Stat. 2055 (2014) ("E-LABEL Act").

[4]47 C.F.R. § 2.935 (Electronic labeling of radiofrequency devices).

[5]FCC Office of Engineering and Technology, KDB Publication 784748 D02 "E-Labeling," v02r01 (Apr. 6, 2020) ("KDB 784748 D02").

15.19,[6] 18.209,[7] and 20.19,[8] together with the packaging-label provisions of Section 2.935 itself. The QR code would resolve to a manufacturer-controlled, persistent online resource containing the FCC ID and other regulatory information for the device, supplemented as appropriate by information accessible through an integrated or connectable display. The manufacturer would remain responsible under existing rules for the accuracy of that information.

The benefits of such a rule are concrete. A QR code on packaging gives consumers immediate access to information in a format they can read at any size, search, translate, and share with a caregiver or with assistive technology. It permits the Commission to update required disclosures and for manufacturers to update factual content (for example, a revised consumer contact for HAC questions) without requiring the recall or relabeling of devices already in the channel. It reduces the volume of printed material accompanying each device. And, importantly, it preserves the Commission's enforcement model: the manufacturer remains the responsible party, and the FCC ID continues to identify the certified device.

Petitioners therefore respectfully request that the Commission issue a Notice of Proposed Rulemaking to consider the changes described below.

II. THE COMMISSION'S EXISTING LABELING REGIME IS POSITIONED FOR MORE EXTENSIVE QR CODE UTILIZATION.

The Commission's rules require that radiofrequency devices subject to equipment authorization carry certain information visible to consumers and regulators. Section 2.925 requires the FCC Identifier to be permanently affixed to the device or, where electronic labeling

[6] 47 C.F.R. § 15.19 (Labeling requirements).

[7] 47 C.F.R. § 18.209 (Labeling requirements).

[8] 47 C.F.R. § 20.19(f) (Labeling and disclosure requirements for hearing aid-compatible handsets).

is used, displayed in accordance with Section 2.935. Section 15.19 requires the well-known Part 15 compliance statement, including the two-conditions advisory regarding harmful interference. Section 18.209 imposes related labeling on industrial, scientific, and medical equipment. And, for handsets subject to the Hearing Aid Compatibility rules, Section 20.19(f) requires that an external printed package label state, in plain language, that the handset is hearing aid-compatible, identify the coupling capabilities of the device, and disclose the handset's conversational gain when certified to the 2019 ANSI standard.

Each of these provisions was developed in an era in which printed packaging and printed inserts were the only practical way for a manufacturer to communicate compliance information to a purchaser at the point of sale. The result is a body of rules that requires substantial text to appear on or with the carton, often in multiple languages, with the further consequence that material additions or corrections cannot be reflected in the printed package once devices have entered the distribution channel.

A. QR codes fit within the scope of the E-LABEL Act and Section 2.935.

Congress recognized the shortcomings of an exclusively printed labeling regime more than a decade ago. The E-LABEL Act directed the Commission to take "appropriate action to allow manufacturers of radiofrequency devices with display the option to use electronic labeling for the equipment in place of affixing physical labels" within nine months of enactment.[9] The Commission responded, and in 2017 adopted Section 2.935 of its rules, which permits radiofrequency devices equipped with an integrated electronic display — and certain devices that

[9] E-LABEL Act, *supra* note 3, at § 3.

operate in conjunction with a host that has such a display — to display the FCC Identifier and required warning statements electronically rather than on a permanently affixed label.[10]

OET's KDB Publication 784748 D02 sets out the detailed conditions under which e-labeling is acceptable, including legibility, accessibility through the device's ordinary operating instructions, and protection of the displayed information from third-party modification.[11] The KDB has been refined repeatedly since 2014 and is now well understood by manufacturers and Telecommunications Certification Bodies (TCBs)[12] alike. Importantly, even where a device qualifies for e-labeling, the existing rules and the KDB require a physical identifier — on the device or on its packaging — sufficient to permit identification at the time of importation, marketing, and sale. The QR code, displayed on the carton, performs precisely that identification function.

B. There is industry consensus for extending use of QR codes.

The Commission opened the "In re: Delete, Delete, Delete" docket[13] in March 2025 to solicit recommendations on rules and guidance documents that no longer serve the public interest. MWF, in its Reply Comments, observed that "the importance of allowing the full use of e-labeling and QR codes has been emphasized by all of the associations" and that doing so would "enable better information for consumers as well as increased accessibility of such information

[10] *See* 47 C.F.R. § 2.935; Amendment of Parts 0, 1, 2, 15 and 18 of the Commission's Rules regarding Authorization of Radiofrequency Equipment, First Report and Order, ET Docket No. 15-170, FCC 17-93, 32 FCC Rcd 8746 (2017) (adopting electronic labeling rules in furtherance of the E-LABEL Act); see also 82 Fed. Reg. 50,827 (Nov. 2, 2017).

[11] KDB 784748 D02, *supra* note 5, § II.

[12] 47 C.F.R. §§ 2.960, 2.962 (2025).

[13] *In re: Delete, Delete, Delete*, GN Docket No. 25-133, Public Notice (Mar. 12, 2025).

for users with disabilities."[14] CTIA, ITI, and CTA made similar recommendations, calling for full authorization of QR codes and e-labeling for the conveyance of regulatory information.[15] The Commission therefore has before it a high degree of industry alignment and an established record on which a rulemaking can proceed efficiently.

C. International practice is ahead of the U.S.'s QR code use.

The use of QR codes and electronic labeling for regulatory disclosures has become an established feature of international practice. The European Union's Packaging and Packaging Waste Regulation, adopted in December 2024, expressly contemplates the use of data carriers such as QR codes on packaging to link consumers to required information.[16] Singapore, Australia, Japan, and other major jurisdictions permit e-labeling for telecommunications equipment under conditions broadly comparable to those imposed by Section 2.935 and KDB 784748.[17] The Commission's authorization of QR codes on packaging would bring U.S. requirements into closer alignment with these regimes and reduce the cost and complexity of producing distinct packaging for each market in which a device is sold.

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[14]Reply Comments of the Mobile & Wireless Forum, GN Docket No. 25-133 (Apr. 28, 2025) at 3 ("MWF Reply Comments"); *see also* Comments of the Information Technology Industry Council, GN Docket No. 25-133 (Apr. 11, 2025)("ITI Comments"); Comments of CTIA, GN Docket No. 25-133 (Apr. 11, 2025)("CTIA Comments"); Comments of the Consumer Technology Association, GN Docket No. 25-133 (April 11, 2025)("CTA Comments").

[15] CTIA Comments, *supra* note 14 at A-10; ITI Comments, *supra* note 14 at 5-7; CTA Comments, *supra* note 14 at 3.

[16]Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste (Packaging and Packaging Waste Regulation).

[17]*See, e.g.,* Singapore IMDA, "Guide on E-Labelling for Telecommunications Equipment" (2021); Australia ACMA, "Compliance Labelling – Electronic Labelling" guidance; Japan MIC, e-labeling provisions under the Radio Law.

III. THE EXPANSION OF QR CODE USAGE WILL ADVANCE THE COMMISSION'S OBJECTIVES AND CONSUMER INTERESTS.

A. Petitioners propose a tiered approach for QR codes, depending on the type of device and its display.

Petitioners recommend that the Commission consider the proposed authorization through a three-tier framework, organized by the device's relationship to a display:

1. **Devices with an integrated display.** For devices with their own display screens — smartphones, tablets, wearables, smart speakers with screens, and the like — the QR code on packaging would direct consumers to the manufacturer's online regulatory resource, and the device itself would continue to make the relevant information available electronically as already contemplated by Section 2.935 and KDB 784748. The in-device path provides redundancy and ensures that the information remains accessible to the consumer long after the carton has been discarded.

2. **Devices ordinarily used with a connectable display.** Many smart devices have no integrated display but, in normal use, pair with or otherwise rely on a paired smartphone, tablet, or computer screen. Examples include wireless earbuds, fitness sensors, certain smart-home devices, and small Internet-of-Things products. For such devices the QR code on packaging would resolve to the manufacturer's online resource, and the e-labeling regime would be carried out through the connected device, as Section 2.935 already permits.

3. **Devices with no display and not intended to be used with one.** A smaller class of products neither has a display nor pairs with one in ordinary use. For these

products the QR code on packaging would remain the principal mechanism for directing consumers to the manufacturer's online regulatory resource. In addition, manufacturers may include in-box printed information as appropriate, just as today. The QR code does not eliminate the option of paper inserts; it provides an additional, persistent, machine-readable path to current information.

This tiered approach preserves the Commission's long-standing preference, reflected in KDB 784748, for the regulatory information to be reachable through more than one path.[18] It does so without imposing rigid technological mandates on devices that are evolving rapidly.

B. The proposed approach advances accessibility and serves users with disabilities.

The accessibility benefits of a QR-code approach are not theoretical. Printed type on packaging — frequently set in small point sizes to accommodate multilingual disclosures — is difficult for many consumers to read, especially older consumers and those with low vision. Information delivered through a QR code can be enlarged, read aloud through a screen reader, translated, or rendered through any assistive technology the user prefers. For Hearing Aid Compatibility, in particular, an online resource permits a consumer to compare handset models, identify a handset that matches the consumer's coupling preference, and retrieve a current point-of-contact for HAC questions — a contact the Commission already requires manufacturers and service providers to post on their websites.[19] The CVAA's instruction that the Commission ensure that advanced communications services and equipment are accessible "unless not

[18]KDB 784748 D02, supra note 5, § II (limiting e-labeling to devices with an integrated electronic display or devices that operate only in conjunction with a host that has such a display).

[19]47 U.S.C. § 610 (Hearing Aid Compatibility Act of 1988); 47 C.F.R. § 20.19.

achievable"[20] is well served by authorizing QR-code delivery of regulatory information in addition to existing paths.[21]

C. The proposed approach reduces waste and supports modern packaging design.

Printed compliance text and multilingual inserts add measurable weight, paper, and ink to every carton. Replacing the printed text on the carton with a single QR code, where the manufacturer chooses to do so, reduces material use without sacrificing the information available to the consumer. International regulators have already begun to recognize the same point. The European Union's PPWR identifies QR codes and other data carriers as a preferred way of linking consumers to packaging and product information, and the EU's broader move toward Digital Product Passports presumes that machine-readable carriers will be the principal interface between consumers and product information.[22]

D. The proposed approach keeps regulatory information current.

Printed packaging captures a snapshot in time. Once a carton enters the channel, the information on it cannot practicably be updated. A QR-code path permits the manufacturer to keep the consumer-facing information accurate and current — including, for example, the contact information that HAC rules require to be made available, the location of additional technical resources, and any updates to required statements that the Commission may adopt in the future. The Commission itself benefits because rule changes can take effect without triggering a wave of packaging recalls.

[20] 47 U.S.C. § 617.

[21] *See* note 14 *supra* and Comments cited therein.

[22] Packaging and Packaging Waste Regulation, *supra* note 16.

E. Reasonable means for assuring information accuracy may be adopted.

Petitioners anticipate that the Commission and commenters will wish to address a number of safeguards in the rulemaking. Petitioners support each of the following as appropriate subjects for the proceeding:

- **Responsible party.** The manufacturer or other party identified in the equipment authorization remains responsible for the accuracy of the information to which the QR code resolves, on the same basis as for any other compliance disclosure.
- **Persistence.** The URL encoded in the QR code must remain operative for the device's expected service life, with appropriate provision for change of corporate ownership.
- **Integrity.** The information at the linked location must be secured against third-party modification, mirroring the requirement that Section 2.935 already imposes on e-labeled information.
- **Accessibility.** The destination must comply with the accessibility provisions of the Commission's rules and reasonable industry guidelines, so that the information is at least as accessible as it would have been on a printed package.
- **Identifier on the carton.** Even where the QR code is used, the FCC Identifier of the device should appear in human-readable form on the carton or, at the manufacturer's option, the QR code itself should encode the FCC ID so that the carton remains identifiable at the time of importation, marketing, and sale.
- **Offline access for retailers and inspectors.** Where appropriate, the rules can require that the same information be available within the device (for tiered Categories 1 and 2 above) or in printed in-box materials (for Category 3), so that information remains reachable when network access is unavailable.

F. QR codes should be authorized to cover the range of required information.

Petitioners request that the Commission frame the rule to cover the full range of FCC-required regulatory information that today appears on or with the packaging of a smart device. At a minimum, the rule should reach:

- The FCC Identifier required by Section 2.925;
- The Part 15 compliance statement and related disclosures required by Section 15.19;

- The labeling required for industrial, scientific, and medical equipment under Section 18.209;
- The RF exposure and Specific Absorption Rate information that current rules require to be made available to consumers;
- The HAC information required by Section 20.19(f), including coupling capability and the handset's conversational gain where certified to the 2019 ANSI standard; and
- Any additional regulatory information that the Commission may, by subsequent action, require to be conveyed to consumers in connection with a smart device.

The last item is particularly salient. A rule that is forward-compatible will avoid the need to revisit the item each time a new disclosure is added. The framework Petitioners propose is well suited to that purpose.

G. The rulemaking can build directly on Section 2.935 and KDB 784748.

Petitioners do not propose specific rule text at this stage, but observe that the existing architecture of Section 2.935 and KDB 784748 provides a natural foundation. The current rule already establishes the principle that compliance information can be conveyed electronically rather than on a permanently affixed label, subject to safeguards. Extending the same principle from the device to its packaging is a modest, well-bounded step. Petitioners expect that the rulemaking can be completed efficiently and on a timeline consistent with the Commission's deregulatory objectives in GN Docket No. 25-133.

H. The business-to-business sector is ripe for adoption of the QR code approach.

Business-to-business equipment is not bought in the way consumer equipment is bought. It is specified, procured, installed, and maintained by professional purchasers. These buyers select equipment against written technical requirements rather than at a retail shelf; they treat regulatory status as a procurement criterion to be verified before an order is placed; and they work routinely from manufacturer datasheets and other documents rather than from the printing

on a carton. For this segment, the information that a QR code designates is the same information the purchaser already expects to obtain electronically.

Because the users of business-to-business equipment are more sophisticated than average consumers, the transition to QR-code labeling in this segment presents no user challenges and would be simple to accomplish. Machine-readable codes are already pervasive in such channels. Bar codes and QR codes are used throughout the sector for asset tagging, inventory and warehouse management. In short, scanning a code is already a familiar step. For this reason, whatever challenges might face the small segment of users unfamiliar with QR codes are, in the business-to-business segment, effectively absent.

There are significant benefits for businesses. A QR code designating a persistent, manufacturer-controlled resource will preserve the FCC ID and associated information better than printed packaging. Moreover, a business will more easily be able to serve multiple markets by making changes online rather than physically relabeling inventory.

Accordingly, Petitioners request that the Commission expressly authorize the use of QR codes to convey required regulatory information on the packaging of business-to-business equipment, whether or not the Commission adopts limits on the use of QR codes for consumer equipment.

IV. CONCLUSION

For the foregoing reasons, Petitioners respectfully request that the Commission, pursuant to Section 1.401 of its rules and Section 4(e) of the Administrative Procedure Act,[23] issue a Notice of Proposed Rulemaking to authorize the use of QR codes on the outside of product packaging as a means of providing consumers access to FCC-required regulatory information for smart devices, including RF exposure information, Hearing Aid Compatibility information, and any other regulatory information that the Commission requires now or may require in the future.

Respectfully submitted,

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[23] 5 U.S.C. § 553(e); *see also* 47 C.F.R. § 1.401.