Notice 2014-DRS1003

Updated November 13, 2014

The purpose of this notice is to advise interested parties that Industry Canada is, effective immediately, allowing devices with an integrated display screen to present the required label information electronically (e-label) in lieu of a physical label or nameplate. Devices without an integrated display screen are allowed to present the e-labelling information through an audio message or a host device display screen connected via physical connection, Bluetooth, Wi-Fi, etc. if the connection to a device with a display is mandatory for use. This applies to all devices subject to certification or registration requirements and to applicable Interference-Causing Equipment Standards (ICES) where this Notice is referenced. Alternative methods of e-labelling, could be allowed on a case-by-case basis by the Department.

A. Information to be displayed
   a. The Industry Canada registration number for terminal equipment devices, certification number for radio equipment, and model identification number.
   b. Any other information required to be provided on the surface of the device unless such information is permitted to be included in the User’s Manual or other packaging inserts.

B. Accessibility to the required information
   a. Users shall be provided clear instructions on how to access the regulatory information stored electronically without requiring special access codes or accessories (i.e., SIM/USIM cards) or having to go through multiple steps (no more than three) in a device’s menu.
   b. Users shall be provided specific instructions which are easily accessible by the average user and included in the User’s manual, operating instructions, packaging material inserts, or product related website.
   c. The equipment authorization application must clearly include the instructions for accessing information as part of the label exhibit.

C. Labelling for Importation and Purchasing
   a. Products utilizing e-labels are required to have a physical label on the product packaging at the time of importation, marketing and sales.
   b. For devices imported in bulk (not packaged individually), a removable adhesive label or, for devices in protective bags, a label on the bags is acceptable to meet this requirement.
   c. Any removable label used shall survive normal shipping and handling and must only be removed by the customer after purchase. For devices already imported in individual packages ready for sale, the information may alternatively be provided on the package and shall contain:

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1 The information can be in the firmware or software menus provided it is easily accessible and cannot be modified by the user.
2 Information provided with the packaging material can be provided on the bags in which the device may be packed or with paper leaflets in the packaging material.
i. The IC certification number for radio equipment, registration number for terminal equipment, and model identification number.

ii. Any other information required by specific requirements to be provided on the surface of the product unless such information is permitted to be included in the User’s manual or other packaging inserts.

D. Security

a. The above information must be programmed by the responsible party and the information must be secured in such manner that it cannot be modified or removed during the course of normal activities that a third-party (typical user) might be authorized to perform (e.g. installation of applications, accessing the menus, etc.).

E. User Manual/Packaging

a. All the applicable regulatory information required on the packaging or User’s Manual must be provided according to the applicable requirements even if it is displayed electronically.

b. E-label displays may include regulatory information required to be placed in the User’s Manual or on the packaging as per the applicable requirements. The following considerations must be taken into account for such information distribution.

i. If the primary User Manual/User Guide is provided by other electronic media (e.g., CD, or online) then as an option this information can also be provided as part of the e-label.

ii. The e-label format must clearly differentiate between the information required to be on the surface of the device and the information required for the User’s Manual or on the packaging.

F. Devices Approved as Certified Transmitter Modules

a. Devices approved as certified transmitter modules may have their IC certification number displayed electronically, if the module or the host in which it is integrated has a display screen. The general guidance for all transmitters discussed above also applies to such devices.

b. If the certified transmitter module provides a secure electronic exchange interface with authentication between the host with integrated display and the module to identify the correct IC certification, then the host can display the IC certification number on the host’s built-in display. The module can be either user-installable or factory-installed. The application for equipment authorization for such modules must include a description of the secure electronic exchange protocol and the security of such arrangement.3

c. If the certified transmitter module does not provide a secure electronic exchange interface with authentication, the host manufacturer can electronically display the IC certification number on the host by factory-encoding the IC certification number of the module

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3 The module must bear a label with its own IC certification number unless it also has an integrated display.
d. Factory encoding must be secure and locked by the host manufacturer and not alterable by any third parties. The programmed information must display IC certification number of the module, preceded by the words "Contains transmitter module", or the word "Contains", or similar wording expressing the same meaning, as follows:

"Contains transmitter module IC: XXXXXX-YYYYYYYYYY"

where XXXXXX-YYYYYYYYYY is the module's certification number.

e. Multiple modules in a host can be electronically displayed as “Contains transmitter modules IC: XXXXXX-YYYYYYYYYY1, XXXXXX-YYYYYYYYYY2”, etc.

Should you have any questions, please submit them to the Directorate of Regulatory Standards at the following e-mail address: res.nmr@ic.gc.ca.