

APPLICATION FOR MODIFICATION OF EXPERIMENTAL AUTHORITY IN ORDER TO ADD A NEW LOCATION (CALL SIGN WD2XYL)

CalAmp Wireless Networks Corporation (“CalAmp Wireless”), seeks to modify its existing permanent experimental authority (Call Sign WD2XYL) to add two new locations in Carlsbad, CA and North Mankato, MN, in addition to the locations at which it currently operates on an experimental basis. On December 31, 2018, LoJack Corporation (“LoJack”) was merged into CalAmp Wireless, a wholly owned subsidiary of CalAmp Corp.¹ CalAmp Wireless continues to develop and market its stolen vehicle recovery system (“SVRS”) and does so under the LoJack name.

As LoJack stated in its initial application for experimental authority,² it relies upon this license to develop and test the next generation of Vehicle Location Units (“VLU”), the radio devices both used by police and implanted within automobiles to communicate a stolen automobile’s location when activated. In particular, LoJack has been developing and testing advanced VLU devices that will be used in foreign markets. As part of the LoJack SVRS, automobiles are equipped with VLU’s, which remain dormant until police send a specific activation message based on a stolen vehicle report. The police first verify the accuracy of the stolen vehicle information with the National Crime Information Center database, then activate the LoJack system, which uses the base stations to turn on the VLU transponder in the stolen vehicle.

CalAmp Wireless now develops enhancements for the vehicle transceiver units deployed in the LoJack SVRS, which the Commission authorized in 1989.³ In addition to the previously authorized locations in Canton and Westborough, MA, CalAmp Wireless seeks to add its two additional engineering facilities in Carlsbad, CA and North Mankato, MN. Experimental authority at these additional locations will permit LoJack to investigate and implement technical improvements to the next generation VLU’s as manufacturing commences and different prototypes are tested to enhance their capabilities. The next generation VLU’s are being developed with a particular emphasis on operating in a more efficient narrowband environment.

The subject VLU’s are specifically intended to be manufactured and exported exclusively to foreign customers for use in LoJack systems abroad. The details of the experimental program remain essentially the same as outlined in LoJack’s initial request for experimental authority:

¹ See e.g. FCC File No. 0111-EX-TU-2018.

² FCC File No. 0176-EX-PL-2006.

³ 4 FCC Rcd. 7558 (rel. Oct. 16, 1989).

- (1) LoJack has been conducting an ongoing program of product development and testing of next generation Vehicle Location Units for international licensees operating in a narrowband environment for the last 13 years.
- (2) LoJack's authority for the use of the 164.175 MHz frequency is subject to its current experimental authorization. The requested frequency is a center frequency in the band that most of the rest of the world has carved out for SVRS, and LoJack requires only the single frequency for testing its devices in that band. LoJack has no intention of migrating to the use of this frequency for use in any domestic SVRS.
- (3) The purpose of the expanded license is to continue to develop and test the product in and around CalAmp Wireless' manufacturing facilities in Carlsbad, CA and with its partner, in North Mankato, MN. In order to expedite the product development process and realize the gains afforded by the new functionality of the VLU's, LoJack needs to conduct this product testing for its international licensees in the United States, near to where its engineering facilities are located.
- (4) The testing will consist of installing up to 10 product samples in various vehicles, and driving them in the area. The base station will be used to activate, track, and deactivate the VLU under various conditions.
- (5) The anticipated power output of the devices is very low and thus the potential for interference is minimal; however, LoJack also has monitoring equipment both at its facilities and in the mobile vehicles to monitor any potential interference to other users of the frequency.
- (6) LoJack agrees to be licensed on an intermittent, secondary, non-interference causing basis, as needed.

For the foregoing reasons, CalAmp Wireless respectfully requests that the OET grant its application for modification of its permanent experimental authority to continue the development and testing of next generation VLU devices at its manufacturing facility before bringing them to market to international users.

CalAmp Wireless reiterates that the testing it conducts on the subject frequency is only for development and testing of technology that is being implemented in the VLU devices for export to other markets. Additionally, given the minimal transmit power of the devices and the monitoring equipment that LoJack is employing, no domestic user of the spectrum will be impacted by the operation of the devices.