

REQUEST FOR RENEWAL OF LICENSE (CALL SIGN KS2XBH)

LoJack Corporation ("LoJack") herein supplements its application for renewal of its experimental license KS2XBH. In its application, LoJack requests renewal of its experimental license, initially granted in 1995, to continue use of the license in the manner in which it was originally issued. For reasons set forth below, LoJack continues to have need to operate its devices on an experimental basis across the continental United States.

LoJack is the designer of specialized units that are utilized in its nationwide network that operates under the Commission's Stolen Vehicle Recovery System ("SVRS") rule.¹ The LoJack SVRS consists of radio receiver-transmitters installed in a hidden location in motor vehicles, tracking devices mounted in police vehicles, and a computerized network of radio transmitters. The units are ultimately licensed, in accordance with the Commission's SVRS rule, to police eligibles on a statewide basis using the Wireless Telecommunications Bureau's (WTB) Universal Licensing System. Presently, LoJack units are authorized on a statewide basis for use in thirty (30) jurisdictions, including the District of Columbia and Puerto Rico.

In anticipation of the initiation of the LoJack system in new jurisdictions, LoJack engineers work with state police authorities for an extended period of time to demonstrate the capabilities of the system at large and the specific functionality of the LJU's. During this critical stage of the development of new statewide systems, LoJack performs demonstrations of its equipment using its experimental license. Once demonstration of the equipment is complete and the police authorities have committed to proceeding with the installation of a statewide system, those police eligibles file for Part 90 authority to operate the system on a permanent basis.

LoJack's request for renewal of its nationwide authorization is supported by good cause. LoJack filed its initial request for experimental authority on the premise that a nationwide license would be more prudent and much less resource-intensive for the OET's staff as an alternative to filing individual STA requests to operate in specific states in anticipation of upcoming demonstrations. Furthermore, in many cases, the demonstration and testing of LoJack's equipment in a specific state exceeds the standard six-month period permitted

¹ 47 C.F.R. 90.20(e)(6).

for experimental Special Temporary Authority ("STA") and LoJack would thus further burden the staff with regular requests for extension of those STA's.

Understanding that the LoJack SVRS network would continue to be expanded throughout the United States, LoJack has viewed a permanent nationwide authorization as more representative of the true need it has for the use of its equipment. As intentional radiators that are ultimately authorized under Part 90 of the Commission's rules, LJU's are not permitted to operate under the Commission's generic demonstration rules absent experimental authority.

At the same time, however, operation of the LoJack facilities in new areas for which Part 90 authority has not yet been issued will not compromise other users of the radio spectrum as only SVRS operators, or proposed operators, are eligible to use the 173.075 MHz frequency requested herein. LoJack's nationwide network and the units that are members of it operate solely on the 173.075 MHz frequency, for which SVRS networks have the only authority. At this point, LoJack's network is the only SVRS network so authorized. Accordingly, grant of LoJack's renewal request will not interfere with or compromise in any way other users of the radio spectrum.

For the reasons set forth above, LoJack respectfully requests that the OET grant its experimental renewal application on a nationwide basis. Given the benefits of LoJack's SVRS to the public at large and the important role that the subject experimental license plays in the expansion of the SVRS, LoJack submits that grants of its request would fully be in the public interest.