

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

LoJack Corporation ("LoJack") herein submits an application for modification of its existing permanent authority (Call Sign WD2XYL) in order to add a new frequency – 169.2 MHz – at the two locations at which it currently operates on an experimental basis.

As LoJack stated in its initial application for experimental authority,¹ it relies upon such authority to continue development and testing of next generation 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. LoJack herein seeks expanded experimental authority to test and develop its VLU's using the 169.2 MHz frequency, consistent with the intent of its original authorization.

As background, LoJack has engineering facilities in Canton, MA and Westborough, MA where it develops enhancements for the vehicle transceiver units that are deployed in its Stolen Vehicle Recovery System ("SVRS"), which the Commission authorized in 1989.² 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 NCIC database, then activate the LoJack system, which uses the base stations to turn on the VLU transponder in the stolen vehicle.

The OET authorized LoJack to test and develop VLU's on 164.175 MHz in 2007. Having experimental authority to test and develop its units on a second frequency of 169.2 MHz 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 and to make those units available to additional markets abroad. The next generation VLU's are being developed with a particular emphasis on operating in a more efficient narrowband environment.

As described in greater detail below, the subject VLU's are specifically intended to be manufactured and exported exclusively to foreign customers for use in LoJack systems abroad for which SVRS operations are allocated on a

¹ FCC File No. 0176-EX-PL-2006, modified by 0057-EX-ML-2014.

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

different frequency than in the United States. The details of the experimental program remain essentially the same as outlined in LoJack's initial request for experimental authority:

- (1) As stated above, for over 8 years 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.
- (2) LoJack's authority for the use of the 169.2 MHz frequency is subject to its current experimental authorization. The requested frequency is a center frequency in the band that several administrations around the world have allocated for SVRS, and LoJack requires only the single frequency for testing its devices in that band. As previously stated, LoJack has no intention of migrating to this frequency in any domestic SVRS.
- (3) The purpose of the expanded license is to develop further and test the product in and around the LoJack manufacturing facilities in Canton and Westborough, MA. 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 is willing to be licensed on an intermittent, secondary, non-interference causing basis, as needed.

For the foregoing reasons, LoJack 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 facilities before bringing them to market to international users.

LoJack 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.