

APPLICATION FOR PERMANENT EXPERIMENTAL AUTHORITY

LoJack Corporation ("LoJack") herein submits an application for permanent experimental authority in order to continue development and testing of the next generation Vehicle Location Unit ("VLU"), the radio device both used by police and implanted within automobiles to communicate a stolen automobile's location when activated. In particular, LoJack is developing and testing an advanced VLU that will be used in foreign markets, and requests experimental authority to develop and test the device at its engineering facilities in the United States.

As background, LoJack has an engineering facility in Canton, 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 1989.¹ 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.

LoJack is in the early stages of developing and testing a new generation of VLU, specifically intended to be manufactured and exported to foreign customers for use in LoJack systems abroad. To that end, LoJack sought and was granted Special Temporary Authority ("STA") by the Office of Engineering and Technology ("OET") on May 26, 2005, to begin product development of that VLU.²

LoJack has had good success thus far with the development of its newest generation VLU and is committing additional resources to its full development for manufacture and export to foreign customers. Accordingly, LoJack herein seeks permanent authority for 36 months to continue the program that the OET granted on an STA basis. The details of the program remain essentially the same as outlined in LoJack's initial request for STA:

- (1) As stated above, LoJack has planned a program of product development and testing of next generation Vehicle Location Unit for international licensees working in a narrowband environment.
- (2) LoJack is seeking authority for the use of the 164.175 MHz frequency. The requested frequency is a center frequency in the band that most of the rest

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

² File No. 0224-EX-ST-2005; renewed by 0663-EX-ST-2005.

- 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 temporary license is to test the product in and around the LoJack Engineering facility in Canton, MA. In order to expedite the product development process and realize the gains afforded by the new functionality of the VLU, LoJack has need to conduct this product testing for its international licensees in the USA, where the 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 permanent experimental authority to continue the development and testing of its next generation VLU device before bringing it to market to international users. LoJack reiterates that the testing it intends to conduct on the subject frequency is only for development and testing of technology that will be implemented in the VLU for export. 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.