



Subject: Rev (2) Request for Permanent Confidentiality, Original Equipment Filing
Updated Confidential Information table: 2 rows added - one row for
external pictures, and one for internal pictures.

FCC ID: IDIEW3KP-07

Model No: EW3 Key Fob

Date: November 11, 2009

Confidential Information

It is requested that the following information be filed as permanently confidential for LoJack Corporation. The device is used for law enforcement tracking of stolen vehicles, and for the purpose of early warning to the vehicle owner. Revealing the appearance of the device would compromise its effectiveness as a tool of early warning.

1) Confidential Information

FCC Rules Part 0.459 refers.

<i>Exhibit</i>	<i>Number of Files</i>	<i>Number of Pages Per File</i>
<i>Schematic</i>	1	1
<i>Theory of Operation and Block Diagram</i>	1	15
<i>Component List</i>	1	2
<i>IDIEW3KP-07 external pictures</i>	2	1
<i>IDIEW3KP-07 internal pictures</i>	2	1
<i>Test Set-up Photos</i>	1	

2) Each of the items shown in the table above has been submitted as part of the LoJack Corporation grant application for the IDIEW3KP-07. The IDIEW3KP-07 interacts with a covert stolen vehicle recovery unit. The unit was submitted for testing against Title 47, CRF Part 90 of FCC regulations. The device operates on the Police allocated stolen recovery frequency of 2.4GHz.

3) Type of Information

The principle objection to the disclosure of information relates to the harm that may be caused to LoJack stolen vehicle recovery operation if this information were to come into the public domain. LoJack operate a stolen vehicle recovery network in conjunction with the local and national Law Enforcement Agencies. The system relies on a unit being



covertly installed in a vehicle. In the event the vehicle is stolen, the unit is activated and transmits a signal that enables the Police car to track and recover the stolen vehicle.

The information referenced above can be categorized in 2 ways, commercially sensitive information and technical trade secrets. The parts list, schematics, and theory of operation contain trade secrets of how LoJack implement and operate the stolen vehicle recovery operation.

4) Competition

In addition the risk of reduction in recovery rate, the recovery of stolen vehicles and vehicle tracking is a highly competitive market place. There are a significant number of companies offering services in direct competition to service operated by LoJack.

5) Competitive Harm

LoJack's business has been built on an extremely high level of successful vehicle recoveries, any information in the public domain that causes a reduction in this poses a threat to LoJack overall operation and market position. The key risk associated with the release of this information is that it could assist in reducing the effectiveness of LoJack ability to recover stolen vehicles by providing information to criminals that could allow the in vehicle unit to be identified or disabled.

These concerns take two forms:-

- i) That the information contained within the schematics, component list, block diagram and theory of operation will enable car thieves to electronically detect and disable the unit through monitoring of IF frequencies or through creation of a jamming signal.
- ii) That the information will make physical identification of the unit easier by putting images of the cable harness and caseworks into the public domain. All LoJack installations are performed by professional installers; as a result the end customer does not in the normal course of events see the unit or the installation location. In order to assist in minimizing the chance of the unit being identified by a criminal it is also requested that the images remain confidential.

A further area of commercial risk is that the capabilities highlighted in the theory of operation and the features implemented on the schematic provide clear indications of the expansion options available with the IDIEW3KP-07 Key Fob design and hence the product roadmap that could be followed by LoJack. The availability of the information described above would potentially assist competitors in reverse engineering the product its operation and in identifying key suppliers and understanding product manufacturing costs.



6) LoJack maintains a culture of security regarding its technology and operational capabilities. Throughout the development of the IDIEW3KP-07 all LoJack's key suppliers have been required to sign Non Disclosure Agreements to restrict information coming in to the public domain.

7) The IDIEW3KP-07 is a new product development for LoJack and the information available in the public domain on its features and operation is extremely limited. LoJack marketing and publicity material does not provide a detailed description of the theory of operation of the units. The only other sources of information about the operation are the technical specifications embodied in the FCC documentation covering the stolen vehicle recovery channel and related specifications in Part 90.

Regards,

A handwritten signature in black ink, appearing to read "Jacinto", with a large, stylized flourish extending from the end of the signature.

Jacinto Patrick Carrera
Sr. Hardware Quality Assurance engineer
LoJack Corporation