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Electronics Design & Consultancy



Plextek

Telecommunication Certification Body
RFI Global Services Ltd.
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Ashwood Park
Basingstoke
Hampshire
RG23 8BG
United Kingdom

Your ref: 78050

Our ref: HUC023 02

Date : 27 Oct 2010

Dear Sir,

Confidentiality Request; Certification Application *FCC ID*: IDIVLU-05

Pursuant to Sections 0.457 and 0.459 of CFR 47 *Company Plextek Ltd on behalf of Lojack corporation* request that the following information, provided to support the FCC application for the *Equipment VLU5, FCC ID*: IDIVLU-05, be held permanently confidential:

1) Confidential information

<i>Exhibit</i>	<i>Number of files</i>	<i>Number of pages per file</i>
<i>Schematic</i>	1	6
<i>Internal Views of the Product</i>	1	6
<i>Parts List</i>	1	8

2) Each of the items shown in the table above has been submitted as part of the LoJack Corporations grant application for the IDIVLU-05. The IDILVU-05 is a covert stolen vehicle recovery unit. The unit was submitted for testing against CFR Part 90 and CFR Part 15 of FCC regulations. The device is a stolen vehicle recovery unit operating on the Police allocated stolen vehicle recovery frequency of 173.075MHz.

3) The principle objection to the disclosure of information relates to the harm that may be caused to LoJack's 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 Police. The system relies on a covert unit being placed in a customer's vehicle and in the event the vehicle is stolen, the unit is activated to transmit a signal that enables the Police car to track and recover the stolen vehicle.

The LoJack security system relies on thieves not being able to easily identify or defeat the in-car unit. LoJack believes that release of the information detailed above could have a detrimental effect on the recovery rate of the LoJack system.

The information in the schematics, component lists and theory of operation also contains trade secrets relating to how LoJack implement and operate the recovery service. Disclosure of this information in turn represents a significant commercial risk to the LoJack operation.

4) In addition to 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) 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's 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's ability to recover stolen vehicles by providing information to criminals that could allow the in car unit to be identified or disabled.

These concerns take two forms:-

- i) That the information contained within the schematics, and parts list 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 by making physical identification of the unit easier by making 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 minimising the risk of identifying the unit it is also requested that the images remain confidential.

A further area of commercial risk is that the features implemented on the schematic provide clear indications of the expansion options available with the VLU5 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.

6) LoJack maintains a culture of security regarding its technology and operational capabilities. Throughout the development of the IDIVLU-05 all LoJack's key suppliers have been required to sign Non Disclosure Agreements to restrict information coming in to the public domain.

7) The IDIVLU-05 is a current product 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 application and related specifications in Part 90.

8) The period for which confidentiality is requested is 15 years. This is based on the manufacturing lifetime of the product anticipated to be 5 years and ongoing service lifetime of the product that is 10 years.

Yours sincerely



Senior Project Consultant