

CONFIDENTIAL

On Track Innovations Ltd.

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Reference: FCCID –JNX-OTI-EFVID

To: Timothy R. Johnson, ATCB.

From: Hemy Itay, OTI

Subject: Your letter of December 5, 2006 regarding the standard antenna connector in our Easy Fuel VID product and the VID FCC label.

Dear Sir,

In response to your letter I would like to clarify the following:

1. SC and VID antenna connectors:

- The SC and the VID are not an off the shelf products which can be sold to individual
 users as they are part of a system which requires special arrangement as detailed
 below.
- The SC & VID are part of the EF system. The VID is the part which is located in the vehicle while the NID and the SC are located in the gas stations. The EF system is connected to a payment system which, in many respects, is similar in nature to the credit cards payment system (Visa, MC, AMEX ...).
- The EF system is provided as a system via dealers who has special arrangements with OTI on one hand and special arrangements with the end users on the other hand.
- Its specialty is reflected in both the installation and commercial procedures.
- <u>Installation procedures:</u>
 - The SC is installed in the office in a special place selected to provide proper RF connection with the gas pumps area. Its antenna connector is placed inside the metal housing where access is authorized only to service personnel.
 - The connection of the SC to the station host computer includes installation of special SW provided by OTI in cooperation with the specific gas station controller vendor with special installation procedure and testing.
 - O The VID is installed inside the vehicle in a hidden place. The installation and routing of the VID itself, the power supply lines, the RF antenna and the refueling antenna requires special skills and intimate knowledge of the vehicles general construction and is performed by dedicated installers, utilizing our special installation equipment and instructions.
 - O Special tuning and programming of each VID is required and performed by the installers in order to bring it to proper operating conditions:
 - Special programming system is required. This system comprises a lap
 top with special OTI program and an RF transceiver, allowing special
 RF communication with the VID during the programming.
 - A special jig which includes a portable NID is used to adjust the threshold of the refueling inlet antenna circuit.

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OTI's special arrangements with the dealers and its customer is based on OTI supplying the special installation equipment and the instructions and the dealer take upon itself to set up a dedicated and educated installation team which both install the systems, perform all the service routines and answer all the field calls. In some cases OTI is actually handling the installers directly.

• Commercial procedures:

- o The Easy Fuel system is aimed for vehicle fleets where proper refueling control is of high importance (mostly antitheft incentives).
- o Back office services are also part of the scheme and are also supplied by OTI to a certain degree, depending on the specific customer requirements.
- The end customers of the EF system are hence not individual but organizations which wish to reduce expenses by adding tighter control over the refueling process.

• Technical debate:

- O The special VID RF window antenna is an Omni antenna with a gain of about OdB
- The vehicle window mounting technique is a more convenient mounting technique for this purpose but it requires a special design which is not exactly a commodity in the market.
- o The gas station environment requires an Omni antenna as the actual positioning of the vehicle in reference to the gas station office antenna is unpredictable.
- All this is to say that the case where a directional antenna, with substantially higher gain, would be connected instead of our VID special Omni antenna, is non realistic.
- O The same is true for the SC controller antenna which is selected to be also a OdB Omni antenna as this better fit the all kinds of stations arrangements with out the need for special selection for each specific setup.
- o The communication limited ranges and the system high sensitivity provide a good signals reception with no need for special features

2. VID FCC Label:

- The VID has a flat housing of about 10.5x6.5x1.5cm (~68cm²). This area is below the 10x8=80cm² limit value as per your letter.
- The VID label is already loaded with all kind of important details, including UL certification details so there is no room for the FCC warning in the label.
- The warning is included in the manual.

Hemy Itay V.P. Hardware Eng. OTI

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