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September 12, 2008

By TCB Filing

Ms. Marlene H. Dortch  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: LSC Locator Systems International Corp.**  
**FCC ID Nos. WDL15D and WDL15L**

Dear Ms. Dortch:

LSC Locator Systems International Corp. ("LSC"), a wholly-owned subsidiary of LoJack Corporation ("LoJack," and collectively with LSC, "LoJack/LSC"), by its undersigned attorneys, hereby responds to requests for information (correspondence reference Nos. 56499 and 56594) from the Office of Engineering and Technology ("OET") regarding the above-referenced FCC ID numbers. These ID numbers are associated with transmitters that operate in the 215 MHz band.

As discussed below, although the 215 MHz band transmitters have been used for location services, LJK/LSC acted in accordance with the terms of what it believed to be validly-issued equipment authorizations. As soon as LJK/LSC became aware of defects in the equipment authorizations, it stopped shipment, and it has no intention of marketing additional 215 MHz band units.

*Background*

In May 2008, LoJack/LSC acquired the assets of Habit Research. Habit Research held equipment certifications issued on December 1, 2005, and on August 28, 2007, under Section 15.242 of the Commission's rules<sup>1</sup> by Timco, a telecommunication certification body ("TCB"), for two 215 MHz band transmitters.<sup>2</sup> The equipment certifications on their face provided authority for a "biomedical telemetry & locator transmitter."<sup>3</sup> The 215 MHz band transmitters are used as part of the "Project Lifesaver" tracking system that makes it possible to locate people at risk, such as Alzheimer's patients, who wander away from their caretakers. Upon consummation of the purchase of Habit Research's assets, LoJack/LSC requested that Timco issue new FCC ID numbers for the 215 MHz band transmitters using LSC's grantee code.<sup>4</sup>

*Discussion*

In late August 2008, in the course of discussions between LJK/LSC and Timco concerning the 215 MHz band transmitters, Timco informed LJK/LSC it had come to the conclusion that the certifications for this equipment had been issued in error. When LoJack/LSC became aware of this problem, it immediately ceased all shipments of 215 MHz band transmitters. It also directed its distributors to halt shipments of devices that they had in stock but had not yet shipped; LoJack/LSC has confirmed that its distributors have done so. Shipments from that time forward have been limited to products authorized to operate in the Low Power Radio Service that also are capable of supporting Project Lifesaver.<sup>5</sup>

LoJack/LSC was in the midst of further investigation, in anticipation of making a full report to the Commission, when it received OET's requests for information. Now that its investigation has been completed, LoJack/LSC will request that Timco cancel the two 215 MHz band certifications.<sup>6</sup> Since acquiring the assets of Habit Research, LoJack/LSC shipped 382 of the 215 MHz band transmitters before the "stop shipment" order went into effect. Additionally, the records of Habit Research indicate that the company had shipped 3,582 of the 215 MHz band transmitters prior to LoJack/LSC acquiring the assets of the company.

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<sup>1</sup> 47 C.F.R. § 15.242.

<sup>2</sup> See FCC ID Nos. TKE70 and TKE2542248.

<sup>3</sup> See *id.*

<sup>4</sup> See FCC ID Nos. WDL15D and WDL15L.

<sup>5</sup> See FCC ID Nos. WDL16D and WDL16L.

<sup>6</sup> In light of this fact, OET's request that LJK/LSC "upload the parts list that includes the microcontroller and updated parts list" should be moot.

Marlene H. Dortch  
September 12, 2008  
Page 3

Please direct questions concerning this matter to the undersigned.

Sincerely,

A handwritten signature in black ink that reads "Henry Goldberg". The signature is written in a cursive style with a large, prominent "H" and "G".

Henry Goldberg  
Joseph A. Godles  
*Attorneys for*  
*LSC Locator Systems International Corp.*  
*LoJack Corporation*

cc: David Galosky, via email