



February 9, 2005

E MAIL

NYSACop@nycap.rr.com

Marlene H. Dortch, Secretary
Federal Communications
Commission 445 12th Street, S.W.
Washington, DC 20554

Re: Petition for Rulemaking of Lojack Corporation, _
RM- filed October 25, 2004 ET Docket No. 04-243

Dear Ms. Dortch:

The New York State Association of Chiefs of Police strongly supports the above-referenced Petition for Rulemaking ("Petition") filed by Lojack Corporation ("Lojack") requesting that the Commission expand the permitted uses and modify the technical requirements for operations on 173.075 MHz. The New York State Association of Chiefs of Police also supports Lojack's request, in the comments it filed in ET Docket No. 04-243, that the Commission provide for a fourteen year transition period, commencing with the effective date of the final rules in the proceeding, to convert to narrowband operations on 173.075 MHz.

Our Association was established in 1901. Since that time we have been a leading voice in New York for law & policy that enhance Public Safety in the State. Our twelve hundred members are comprised of Chiefs, Commissioners, and other executive level members, active and retired of law enforcement agencies from across the State.

As described in the petition, Lojack seeks rule changes to allow it to provide public safety entities with additional services that will help us function better. Lojack also seeks changes to the technical rules that, in addition to facilitating these additional services, will enable Lojack to improve the performance of its stolen vehicle recovery system and to compensate for the effects of converting to narrowband operations. We believe Lojack's system enhancements will benefit us greatly.

Many of our members have been personal witnesses to the benefits of LoJack's vehicle recovery equipment. With the proposed expansion of permitted uses, we expect the success of Lo Jack's program to grow.

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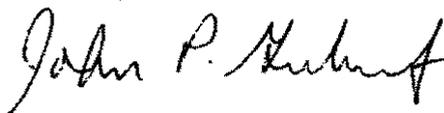
Our Organization would use and benefit from Lojack's proposed new services. For instance, by obtaining the position of stolen vehicles via GPS, we will be able to dispatch tracker equipped patrol vehicles to the general area where the stolen vehicles are located, and then perform the final tracking and recovery with the Vehicle Location Tracker. We believe this improvement will make our operations more efficient and significantly reduce the time elapsed from the theft of a vehicle and its recovery. This equates to far less damage to recovered vehicles and improved recovery rates.

As our country becomes a target for terrorist activities, we are increasingly concerned regarding the movement of hazardous and dangerous cargoes. Lojack's cargo tracking devices will enable us to track and recover stolen cargo that could threaten public safety and national security throughout all of North America. This will be accomplished by establishing a police operated national database of Lojack equipped containers and cargoes, which can be queried by any law enforcement agency in the United States.

We also support Lojack's concept of including additional public safety and security features in its network. In addition to stolen vehicle recovery, Lojack may provide automatic notification of a severe accident, including the location of the accident, directly to public safety. The network may also indicate the need for emergency medical or other assistance as appropriate. Finally, we support Lojack's concept of tracking individuals who are a risk, either to themselves or their community, including Alzheimer's victims, autistic children, and candidates for home arrest.

We respectfully ask the Commission to initiate the rulemaking Lojack proposed in its Petition. We also urge the Commission to provide Lojack with a fourteen-year period to complete its transition to the new narrowband operations.

Sincerely,

A handwritten signature in black ink, appearing to read "John P. Grebert". The signature is written in a cursive, flowing style.

John P. Grebert

Executive Director