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October 5, 2007

By Electronic Filing

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

**Re: In the Matter of Amendment of Section 90.20(e)(6) of the
Commission's Rules, WT Docket No. 06-142, RM-11135
Ex Parte Presentation**

Dear Ms. Dortch:

In response to staff inquiries, the LoJack Corporation ("LoJack") hereby provides additional information to supplement the record in these proceedings with regard to its request for an increased duty cycle for its vehicle location units ("VLUs").

LoJack requested in its Petition for Rulemaking that the Commission eliminate its duty cycle requirement for VLUs (as well as for base stations).¹ Subsequently, the Commission, in its Notice of Proposed Rulemaking ("NPRM"), proposed instead that the general duty cycle limit for VLUs be increased from 200 milliseconds every ten seconds to 400 milliseconds every ten seconds and that the duty cycle limit for VLUs that are being actively tracked be increased from 200 milliseconds per second to 400

¹ *In the Matter of Amendment of Section 90.20(e)(6) of the Commission's Rules Regarding Stolen Vehicle Recovery Systems*, Petition for Rulemaking, RM-11135 (filed Oct. 25, 2004) ("Petition").

milliseconds per second.² LoJack, in its comments, agreed that this proposal would be sufficient for its needs but suggested that the Commission apply the VLU duty cycle relief to both narrowband (12.5 kHz) and wideband (20 kHz) VLUs, rather than just to narrowband VLUs.³

As LoJack explained, LoJack requires an increased VLU duty cycle – for both wideband and narrowband VLUs – in order to provide additional new public safety services.⁴ The higher duty cycle will allow LoJack to send more information on its uplink transmissions, which will be necessary for LoJack to provide additional services such as tracking cargo and hazardous materials, services the Commission previously found to be important to public safety when it granted LoJack a waiver to perform these services.⁵

For any additional new service that LoJack provides, LoJack would need to send a different reply code identifier from what it uses for stolen vehicle recovery operations. In addition, without the requested rule change, LoJack would not be able to send GPS location coordinates to law enforcement. LoJack would need to be able to send at least four messages of 1.8 seconds each to accomplish this, but the present uplink duty cycle rule does not allow for such transmissions.

² *In the Matter of Amendment of Section 90.20(e)(6) of the Commission's Rules*, Notice of Proposed Rulemaking at ¶¶ 17-18, WT Docket No. 06-142 (rel. July 24, 2006) (“NPRM”).

³ *In the Matter of Amendment of Section 90.20(e)(6) of the Commission's Rules*, Comments of LoJack Corporation at pgs. ii and 9, WT Docket No. 06-142 (Sept. 22, 2006) (“LoJack Comments”).

⁴ As explained in its comments on the NPRM, “[a] less restrictive duty cycle also would facilitate added functionality such as transmitting GPS coordinates to make for quicker tracking and recovery.” LoJack Comments at 8. LoJack also noted in its *ex parte* filing of March 26, 2007, that, “[l]iberalizing the SVRS duty cycles . . . will make it possible for LoJack to support additional public safety services.” *Letter to Marlene H. Dortch from Henry Goldberg, Re: In the Matter of Amendment of Section 90.20(e)(6) of the Commission's Rules*, WT Docket No. 06-142, RM-11135, *Ex Parte Presentation*, at p. 1 of attachment, Overview section (March 26, 2007). Even if LoJack uses cellular frequencies to activate the VLUs, it would still use its frequency to send these uplinks.

⁵ *In the Matter of LoJack Corporation, Request for Partial Waiver of Section 90.20(e)(6) of the Commission's Rules*, Order at ¶ 13 (rel. Dec. 29, 2005) (finding that a waiver of its rules to allow for tracking of hazardous materials “should give law enforcement entities an additional, important tool to address the security concerns associated with transporting of hazardous materials and cargo.”).

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, slightly slanted style.

Henry Goldberg
Attorney for the LoJack Corporation

cc: Julius Knapp
Bruce Romano
Zenji Nakazawa
Tom Eng