

06-148

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
Request by LoJack Corporation)
Of a Partial Waiver of)
Section 90.20(e)(6) and Part 2 of the)
Commission's Rules)

FILED/ACCEPTED

FEB - 4 2011

Federal Communications Commission
Office of the Secretary

AMENDMENT TO REQUEST FOR PARTIAL WAIVER

The LoJack Corporation ("LoJack") is seeking a waiver of Section 90.20(e)(6) and Part 2 of the Commission's rules to allow for the activation of the SVRS frequency using a portable device and to allow for activation using a portable device by any Public Safety Pool eligible.¹ LoJack now files this Amendment to its pending Request for Partial Waiver to clarify that it requires a duty cycle of up to 1000 milliseconds over every 8 seconds for the purpose of activating mobile units (Vehicle Locator Units, or in the case of missing persons, wristwatch-type units).

The new generation mobile units being introduced required changes to LoJack's network that result in the use of an indexing system different from what was used previously. This indexing process assigns each device a specific "frame" within a tower transmission, reducing the amount of time that the mobile unit consumes power listening for its activation code. The benefit of this is that the mobile units will use substantially less power, allowing for a battery-powered unit and for lower power draw from the vehicle electrical system in a vehicle-powered unit.

The new indexing process, however, will require longer transmission times in order to effectively activate the system. The interplay of the indexing process and the duty cycle limitations in the present rules (which were established before the

¹ *In the Matter of Request by LoJack Corporation of a Partial Waiver of Sections 90.20(e)(6) and Part 2 of the Commission's Rules, Request for Partial Waiver (filed June 30, 2010).*

development of the indexing) could introduce delays of up to 20 minutes in the activation and tracking process. Allowing transmission of up to 1 millisecond every eight seconds would allow for activation of the lower powered mobile units and materially improve efficiency in life-threatening circumstances. It also will improve the efficiency of police tracking of out-of-network stolen vehicles. For these reasons, LoJack requires a duty cycle of up to 1,000 milliseconds over every 8 seconds for activation of the mobile units.

In the LoJack system, once a mobile unit is activated and acknowledges the activation signal, the transmission of activation signals stops. Although the proposed activation command duty cycle is longer than the present duty cycles, the total time over which the activation commands will be sent is shortened. Moreover, the requested duty cycle for activation is less than the 400 milliseconds per second permitted by the rules for active tracking.

Respectfully submitted,

LOJACK CORPORATION



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