



City of Cleveland  
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Received & Inspected

DEC 26 2013

FCC Mail Room

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Partial Waiver of Section 90.20(e)(6)(i) by the International Association  
Of Auto Theft Investigators PS Docket 13-281

Dear Secretary Dortch:

Our Agency strongly supports the request for a partial waiver (Waiver Request) filed by the International Association of Auto Theft Investigators (IAATI) requesting that the Federal Communications Commission (FCC) waive section 90.20(e)(6)(ii) of its rules, thereby allowing public safety entities to track and recover stolen vehicles equipped with SVRS equipment for as long as those vehicles are in use.

The Lojack Vehicle Locator Units in our front line vehicles have assisted in the recovery of thefts of vehicles and equipment. In addition, we work directly with Lojack representatives in investigations that sometimes cross jurisdictional borders. Lojack has also provided us with additional monitors specifically for tracking major auto theft rings operating in our city.

As described in the Waiver Request, IAATI seeks a partial waiver to allow wideband (25kHz) Vehicle Locator Units to transmit response signals after the FCC's May 27, 2019, narrow banding deadline so that older stolen vehicles equipped with these devices may be tracked and recovered.

As we feel that the FCC's grant of IAATI's Waiver Request will be a great benefit to law enforcement and the public, we urge the FCC to adopt IAATI's Waiver Request.

Sincerely,

Michael McGrath  
Chief of Police

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