

Telecommunication Certification Body,
RFI Global Services Ltd,
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United Kingdom



Subject: Certification Application
FCC ID: IDIVLU-05

Our ref: 40C033 02

Date : 9 February, 2005

Confidential Information

It is requested that the following information is to be held confidential on behalf of LoJack Corporation.

1) Confidential information

FCC Rules Part 0.459 refers.

<i>Exhibit</i>	<i>Number of files</i>	<i>Number of pages per file</i>
<i>Schematic</i>	1	6
<i>Theory of Operation and Tuning Procedure</i>	1	8
<i>External and Internal Views of the Product</i>	4	1
<i>Component List</i>	1	6
<i>Block Diagram</i>	1	1

2) Each of the items shown in the table above has been submitted as part of the LoJack Corporations grant application for the IDIVLU-05. The IDILVU-05 is a covert stolen vehicle recovery unit. The unit was submitted for testing against CFR Part 90 and CFR Part 15 of FCC regulations. The device operates on the Police allocated stolen vehicle recovery frequency of 173.075MHz.

3) Type of Information

The principle objection to the disclosure of information relates to the harm that may be caused to LoJack's stolen vehicle recovery operation if this information were to come into the public domain. LoJack operate a stolen vehicle recovery network in conjunction with the Police. The system relies on a unit being covertly installed in a vehicle. In the event the vehicle is stolen, the unit is activated and transmits a signal that enables the Police car to track and recover the stolen vehicle.

The information referenced above can be categorised in 2 way, commercially sensitive information and technical trade secrets. The parts list, schematics, and theory of operation contain trade secrets of how LoJack implement and operate the stolen vehicle recovery operation.

The parts list, schematics, block diagram and theory of operation, and images also represent information of significant commercial value, in terms of key suppliers and product pricing. There is also commercial value associated with any technical information that could if released have a detrimental effect on the recovery rate of the LoJack system.

4) Competition

In addition to the risk of reduction in recovery rate the recovery of stolen vehicles and vehicle tracking is a highly competitive market place there are a significant number of companies offering services in direct competition to service operated by LoJack.

5) Competitive Harm

LoJack's business has been built on an extremely high level of successful vehicle recoveries, any information in the public domain that causes a reduction in this poses a threat to LoJack's overall operation and market position. The key risk associated with the release of this information is that it could assist in reducing the effectiveness of LoJack's ability to recover stolen vehicles by providing information to criminals that could allow the in car unit to be identified or disabled.

These concerns take two forms:-

- i) That the information contained within the schematics, component list, block diagram and theory of operation will enable car thieves to electronically detect and disable the unit through monitoring of IF frequencies or through creation of a jamming signal.
- ii) That the information will make physical identification of the unit easier by putting images of the cable harness and caseworks into the public domain. All LoJack installations are performed by professional installers, as a result the end customer does not in the normal course of events see the unit or the installation location. In order to assist in minimising the chance of the unit being identified by a criminal it is also requested that the images remain confidential.

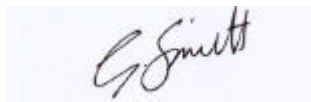
A further area of commercial risk is that the capabilities highlighted in the theory of operation and the features implemented on the schematic provide clear indications of the expansion options available with the VLU5 design and hence the product roadmap that could be followed by LoJack. The availability of the information described above would potentially assist competitors in reverse engineering the product its operation and in identifying key suppliers and understanding product manufacturing costs.

6) LoJack maintains a culture of security regarding its technology and operational capabilities. Throughout the development of the IDIVLU-05 all LoJack's key suppliers have been required to sign Non Disclosure Agreements to restrict information coming in to the public domain.

7) The IDIVLU-05 is a new product development for LoJack and the information available in the public domain on its features and operation is extremely limited. LoJack marketing and publicity material does not provide a detailed description of the theory of operation of the units. The only other sources of information about the operation are the technical specifications embodied in the FCC documentation covering the stolen vehicle recovery channel and related specifications in Part 90.

8) The period for which confidentiality is requested is 15 years. This is based on the manufacturing lifetime of the product anticipated to be 5 years and ongoing service lifetime of the product that is 10 years.

Yours,



Gerard Smith,
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