



LoJack SafetyNet, Inc.  
200 Lowder Brook Drive  
Suite 200  
Westwood, MA 02090

February 7, 2011

**CONFIDENTIAL TREATMENT REQUESTED**

Federal Communications Commission  
Authorization and Evaluation Division  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: LoJack SafetyNet, Inc. TCB Application

**REQUEST THAT MATERIALS BE WITHHELD FROM PUBLIC INSPECTION**

Gentlemen:

LoJack SafetyNet, Inc. ("LoJack") hereby submits the attached TCB Application on Form 731. Due to its proprietary nature, LoJack requests that the following information accompanying this application be subject to long-term confidentiality and be withheld from public inspection and not be placed in the Commission's public files, pursuant to Section 552(b)(4) of Part 5 of the U.S. Code and Sections 0.457(d) and 0.459 of the Commission Rules:<sup>1</sup>

- Schematics for A202
- Block Diagrams
- Tuning Procedures
- Internal Photos

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<sup>1</sup> 5 U.S.C. § 552(b)(4); 47 C.F.R. § § 0.457(d) and 0.459.

- Circuit Description

This information qualifies as trade secrets and commercial information that would not routinely be made available for public inspection.<sup>2</sup> The circuit design and the antenna design of our radio equipment is sensitive proprietary information. In part to protect this information, the housing of the transmitter is permanently bonded shut. The urethane adhesive and potting compound covers the inside of the housing, the antenna element, and the printed circuit board. Any attempt to force open or cut into the housing would destroy the antenna and the circuit board.

It would be damaging to LoJack's business to have this information freely available online. Public disclosure would result in trade secrets no longer being secret, and no longer being protectable. LoJack discloses unpatented trade secrets only pursuant to agreements which contain non-disclosure obligations. An example of LoJack's standard nondisclosure agreement is attached.

Any questions concerning this submission should be addressed to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Thomas A. Wooters', written over a horizontal line.

Thomas A. Wooters  
Vice President, Regulatory Strategy

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<sup>2</sup> See 47 C.F.R. § 0.457(d); see also *Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879 (D.C. Cir 1992) ("We conclude that financial or commercial information provided to the Government on a voluntary basis is 'confidential' for the purpose of Exemption 4 [to the FOIA] if it is of a kind that would customarily not be released to the public by the person from whom it was obtained.").