

Date: February 23, 2018

Attention: Application Examiner

RE: Request for Confidentiality
Applicant: LoJack Corporation
FCC ID: IDI-VLU10VP
Models: VLU10-VP

To Whom It May Concern:

Permanent Confidentiality:

Request is hereby submitted by LoJack Corporation to withhold permanently from public review certain portions of the application for equipment certification for the referenced FCC identifiers. This request for confidentiality is made pursuant to 47 CFR 0.457(d) and 0.459 of the FCC Rules. In particular, the following sections of the application are to be kept permanently confidential:

- Schematic
 - 2100-0336-02SC_rev_1.pdf
 - 2100-0377-02SC_rev_1.0.pdf
- Detailed Block Diagrams
 - VLU10-VP Block diagram.pdf
- Detailed Operational/Functional Description
 - VLU10-VP Functional Description.pdf

Rationale for request for confidentiality:

LoJack Corporation has invested considerable time and materials in research and development to produce the referenced product. Disclosure of the permanently confidential portions of this application to competitors would not only give them significant competitive advantages in developing similar products, but, would also disclose successful implementation of unpublished, leading edge technology developed by us.

The principle objection to the disclosure of information relates to the harm that may be caused to LoJack Stolen Vehicle Recovery Network if this information were to come into the public domain. LoJack operates a stolen vehicle recovery network in conjunction with the local and national Law Enforcement Agencies. 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 to track and recover the stolen vehicle.

The information referenced above can be categorized in 2 ways, commercially sensitive information and technical trade secrets. The Schematics, Block Diagrams, and functional Description contain trade secrets of how LoJack implements and operate the stolen vehicle recovery operation.

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 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 the LoJack Stolen Vehicle Recovery Networks and its ability to recover stolen vehicles by providing information to criminals that could allow the in vehicle transponder to be identified or disabled.

These concerns take two forms:

- i) That the information contained within the schematics, 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 minimizing the chance of the unit being identified by a criminal it is also requested that the images remain confidential.

The fee for confidentiality has been submitted along with the fee for certification. If you have questions or need further information, please contact the undersigned.

Sincerely,



Vincent J Ricci
Manufacturing Test Engineer
LoJack Corporation