**DA 18-770**

**Released: July 25, 2018**

**THE Public Safety and Homeland Security Bureau Seeks Comment on A Request by LoJACK CORPORATION TO MODIFY FIFTY-THREE LICENSES TO COMPLY WITH the commission’s NARROWBANDING REQUIREMENT**

**Comment Date: August 24, 2018**

**Reply Comment Date: September 10, 2018**

The Public Safety and Homeland Security Bureau (Bureau) seeks comment on a request by LoJack Corporation (LoJack) to have the Bureau modify fifty-three licenses, which comprise its national stolen vehicle recovery system (SVRS), to comply with the Commission’s narrowbanding requirements.[[1]](#footnote-3) LoJack requests that the Commission allow it to file a “master” narrowband modification application on behalf of all police agencies that operate LoJack systems. LoJack submits that granting its request would reduce burdens on the licensees and the Commission, and allow a uniform consolidation across the SVRS system.[[2]](#footnote-4)

In March 2005, the Commission’s instituted narrowbanding of the Private Land Mobile Radio (PLMR) bands below 470 MHz to improve spectrum efficiency in the bands.[[3]](#footnote-5) Because of the extensiveness of LoJack’s system, and because it has exclusive use of frequency 173.075 MHz, the Commission allowed LoJack to delay compliance with the narrowbanding mandate until May 27, 2019.[[4]](#footnote-6)

To facilitate compliance with the narrowbanding mandate, LoJack seeks to file a master application that encompasses all 30 authorized SVRS licensees.[[5]](#footnote-7) It includes in its request, declarations from each of the 30 licensees authorizing filing of the modification application on its behalf. The licenses to be modified are listed in the appendix hereto.

LoJack proposes two modifications to the licenses: (1) change the emission designator from wideband, 20K0F2D, to narrowband, 11K2F2D, for all fixed and mobile transmitters;[[6]](#footnote-8) and (2) increase effective radiated power of the SVRS base stations from 300 watts to 500 watts and increase the output power of the SVRS mobile units from 2.5 watts to 5 watts.[[7]](#footnote-9) LoJack contends that the requested power increases are required to compensate for the change to the emission designator[[8]](#footnote-10) and that there will be no consequent increase in potential interference to television Channel 7 reception as a result of the power increases.[[9]](#footnote-11)

We seek comment on the LoJack proposal and the representations LoJack has made in its request. We especially solicit comment from any party that would be adversely affected by LoJack’s proposal to streamline the narrowbanding licensing process and increase power of its base stations and mobile transmitters.

Interested parties may file comments on or before **August 24, 2018**.[[10]](#footnote-12)Parties may file replies on or before **September 10, 2018**.[[11]](#footnote-13)

Instructions for Filing Comments

All comments and reply comments should reference the subject LoJack Waiver Request and the DA number indicated on this *Public Notice*. Comments may be filed: (1) electronically by accessing the applicant’s file number(s) in the Commission’s Universal Service Licensing System (ULS),[[12]](#footnote-14) or (2) by filing paper copies.

Electronic Filers:  Pleadings may be submitted electronically as follows:

* Begin the process by using the following link to the ULS website <https://wireless2.fcc.gov/UlsEntry/pleadings/pleadingsType.jsp>. The link will take you to the “*Pleading Information*” screen for “Non-docketed Pleadings” where you select “Reply” in the drop-down window for the type of pleading and then enter the pleadings filer information. Completion of the contact information is optional. Upon completion of this screen, please note the instructions for the filing: “*Pleadings must be dated and must include a signature, in this instance an electronic signature, and the address and phone number of the signing party*.”[[13]](#footnote-15)Click on “CONTINUE.”
* The second step is to complete the *File Numbers/Call Signs* screen. Click if the pleading pertains to a File Number or Call Sign and enter the File Number or Call Sign. Please note that you must enter a File Number or Call Sign to continue. If the pleading pertains to multiple applications or licenses, you must enter each File Number or Call Sign as appropriate. After clicking the “SUBMIT” button, the screen will update to show all the File Numbers/Call Signs associated with the pleading. At this time, you may delete selected File Numbers/Call Signs from the page before continuing.
* The third step is to complete the *Attach File* screen to attach the pleading document. Use the drop down box to select Pleading or Confidential Pleading. The “BROWSE” button opens a file upload window where you will locate and select your pleading file. The Description field allows you to enter a brief description for the pleading. Click the “ADD ATTACHMENT” button to upload your pleading. You may submit up to thirty files for each pleading but each file must be smaller than 10 MB in size. You also have the opportunity to delete any selected file from the pleading.
* Finally, to complete your electronic pleading submission, click on the “SUBMIT PLEADING” button and the *Confirmation* screen will be displayed. The *Confirmation* screen will display your Confirmation Number as well as your entered pleadings information. You may print this page for your records by selecting the Print Page link at the top of the page and have the option of submitting another pleading or returning to the ULS website by selecting a link at the bottom of the page.

The ULS Application Search results will display pleadings under the ADMIN tab when a comment or reply comment has been filed. Users can view the pleading by clicking on the link for the specific comment or reply comment in the Description field. The general public will not be able to view confidential pleadings.

For additional information or assistance on how to file a comment or reply comment or other relevant pleading, you may visit the Web at http://esupport.fcc.gov. You may also call the FCC ULS Customer Support Center at (877) 480-3201 and select option 2, or (888) 225-5322 and select Option 2, or (717) 338-2888. For TTY, please call (717) 338-2824. Assistance from the FCC ULS Customer Support Center is available between the hours of 8 a.m. to 6:00 p.m. Eastern Time, Monday through Friday (except Federal holidays). To provide quality service and ensure security, all telephone calls to FCC ULS Customer Support Center are recorded.

Paper Filers:  Parties who choose to file by paper must submit an original and one copy of each filing.

* All hand-delivered or messenger-delivered paper filings for the Commission’s Secretary must be delivered to FCC Headquarters at 445 12th St., SW, Room TW-A325, Washington, DC 20554. The filing hours are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.
* Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
* U.S. Postal Service first-class, Express, and Priority mail must be addressed to 445 12th Street, SW, Washington DC 20554.

The application(s), waiver request, and comments and reply comments can be accessed electronically via the Commission’s Universal Licensing System, http://wireless.fcc.gov/uls.

People with Disabilities: To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (voice), 202-418-0432 (tty).

For further information regarding this proceeding contact Brian Marenco, Electronics Engineer, Policy and Licensing Division, Public Safety and Homeland Security Bureau, (voice) (202) 418-0838 or Brian.Marenco@fcc.gov.

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**APPENDIX**

List of Licensees & Authorizations

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| --- | --- | --- | --- | --- |
| **Licensee** | **FRN** | **Auth Signature** | **Date** | **Call Sign** |
| Arizona, State of | 0001591023 | Kevin A. Rogers | 8/25/2017 | WPMM669 |
| Colorado, State of  | 0001613934 | Richard Schmidt | 8/28/2017 | WPTK929 |
| State of Connecticut,ATTN: State Police Division | 0003568011 | Mark Matson | 8/16/2017 | WPHK438, WQWU791 |
| Delaware, State of  | 0002187367 | Thomas Kadunce | 1/17/2018 | WPNS384 |
| District of ColumbiaGovernment, MetropolitanPolice Department | 0002088631 | Karima Holmes | 2/2/2018 | WPED308 |
| Dept. Hwy Safety & MotorVehicles, Florida HighwayPatrol | 0001802693 | Vic Thomas | 8/24/2017 | WNWU571, WPQB583,WPZL332, WQJL992 |
| Georgia, State of  | 0001849843 | Ralph Bevan | 3/5/2018 | WPBK949, WPWZ315 |
| Illinois, State of  | 0002787893 | Jeffrey E. Sexton | 8/15/2017 | WNVD283 |
| City of Los Angeles  | 0016433013 | Silva L. Atwater | 8/25/2017 | WQHD385, WNSZ607,WNSZ608, WPQG846,WPRW899, WPVV324, WQDD530,WQYM227 |
| Louisiana, State of (Dept. ofPublic Safety) | 0001722982 | Julio Peck | 8/17/2017 | WPXI720 |
| Maryland State Police  | 0002134120 | Gary Davis, Jr. | 9/1/2017 | WPLP844 |
| Commonwealth ofMassachusetts | 0021579420 | C. Blair Sutherland | 10/02/2017 | WNWG807, WPUL255,WPVV812 |
| Michigan, State of  | 0004806576 | Mark Sandberg | 8/23/2017 | WNSY452, WNSY453 |
| Nevada, State of  | 0005761721 | Richard Burger | 8/16/2017 | WPRS254 |
| New Hampshire Dept Of SafetyState Police Comm Maint | 0003656535 | James Kowalik | 9/29/2017 | WPOX716 |
| New Jersey State Police  | 0004452025 | Edward J. Zapf | 9/06/2017 | WNRU939, WNRU940 |
| New Mexico, State of  | 0001608108 | Joseph A. Martinez | 10/17/2017 | WQTH628 |
| State of New York, Division ofState Police | 0003438595 | Samuel GregoryDiana | 8/11/2017 | WPFS619, WPUX388 |
| North Carolina State Bureauof Investigation | 0011016466 | R. ChristopherLaws | 8/21/2017 | WQBL588, WQGH385 |
| Ohio, State of, Highway Patrol  | 0013859699 | Maj. Shawn Davis | 8/17/2017 | WQDJ531, WQED841 |
| Oklahoma Department ofPublic Safety | 0017935958 | Gene Thaxton | 12/13/2017 | WQJI506 |
| Oregon State (OWIN)  | 0001556125 | Robert Reish | 8/17/2017 | WQDD261 |
| Pennsylvania, Commonwealthof Pennsylvania State Police | 0016676868 | Terrance Lee Ash | 8/18/2017 | WQKE793 |
| Rhode Island State Police  | 0004088142 | Thomas G. Crotty | 8/24/2017 | WPFS403 |
| South Carolina LawEnforcement | 0005456629 | Michael W. Naylor | 10/06/2017 | WQER759, WQGG795 |
| Tennessee Bureau ofInvestigation | 0014494165 | Brad Truitt | 10/09/2017 | WQGL264, WQET845 |
| Texas, State of (Dept. ofPublic Safety) | 0001672419 | Todd Early | 8/23/2017 | WPLT916, WPWF970 |
| Utah Motor VehicleEnforcement Division | 0019074285 | Allan Shinney | 8/15/2017 | WQKX391 |
| Virginia State Police,Department of State Police | 0002032175 | John G. Agee | 10/23/2017 | WQTM566 |
| Washington State Patrol  | 0010493245 | John L. Woodcock | 8/21/2017 | WQHY985, WQGM862 |

1. Letter from Henry Goldberg, Attorney for LoJack Corporation, to Tracy Simmons, Branch Chief, Policy and Licensing Division, Public Safety and Homeland Security Bureau, Apr. 2, 2018, (LoJack Request). Included in its request is a list of SVRS licensees and authorizations, an engineering certification, and channel 7 interference studies. *See also* 47 CFR § 90.20(e)(6) (discussing stolen vehicle recovery systems). [↑](#footnote-ref-3)
2. LoJack Request at 2. [↑](#footnote-ref-4)
3. Amendment of Parts 2 and 90 of the Commission's Rules to Provide for Narrowband Private Land

Mobile Radio Channels in the 150.05-150.8 MHz, 162-174 MHz, and 406.1-420 MHz Bands that are Allocated for

Federal Government Use, Report and Order, 20 FCC Rcd 5793, 5796, para. 5 (2005). [↑](#footnote-ref-5)
4. *Id*. [↑](#footnote-ref-6)
5. Some licensees hold more than one SVRS license. *See* Appendix. [↑](#footnote-ref-7)
6. LoJack Request at 3. [↑](#footnote-ref-8)
7. *Id*. *See Amendment of Section 90.20(e)(6) of the Commission’s Rules*, Report and Order, 23 FCC Rcd 12601 (2008). *See also*, 47 CFR § 90.20(e)(6)(iii)-(iv) (Authorizing 5 watt mobile and 500 watt base station effective radiated power). [↑](#footnote-ref-9)
8. LoJack Request at 3.An emission designator is a code associated with a frequency that gives information about the frequency's necessary bandwidth, the nature of the signal modulating the main carrier and the type of information to be transmitted. *See* 47 CFR § 2.201. [↑](#footnote-ref-10)
9. LoJack Request at 4. 47 CFR § 90.20(e)(6)(viii) (“applicants shall perform an analysis for each base station that is located within 169 km of a TV Channel 7 transmitter of potential interference to viewers”). [↑](#footnote-ref-11)
10. 47 CFR § 1.405. [↑](#footnote-ref-12)
11. *Id*. [↑](#footnote-ref-13)
12. *Wireless Telecommunications Bureau Enhances the Commission’s Universal Licensing System to Implement Electronic Filing for Pleadings*, Public Notice*,* 21 FCC Rcd 424 (WTB 2006). *See* https://docs.fcc.gov/public/attachments/DA-06-125A1.pdf. [↑](#footnote-ref-14)
13. *See* 47 CFR Part 1. [↑](#footnote-ref-15)