



PUBLIC NOTICE

Federal Communications Commission
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Washington, D.C. 20554

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DA 18-770

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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 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

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 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

To facilitate compliance with the narrowbanding mandate, LoJack seeks to file a master application that encompasses all 30 authorized SVRS licensees.⁵ 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.

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).

² LoJack Request at 2.

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).

⁴ *Id.*

⁵ Some licensees hold more than one SVRS license. *See* Appendix.

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 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 LoJack contends that the requested power increases are required to compensate for the change to the emission designator⁸ and that there will be no consequent increase in potential interference to television Channel 7 reception as a result of the power increases.⁹

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 Parties may file replies on or before **September 10, 2018**.¹¹

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 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

⁶ LoJack Request at 3.

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).

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.

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").

¹⁰ 47 CFR § 1.405.

¹¹ *Id.*

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>.

*this instance an electronic signature, and the address and phone number of the signing party.*¹³ 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.

¹³ See 47 CFR Part 1.

- 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 Marengo, Electronics Engineer, Policy and Licensing Division, Public Safety and Homeland Security Bureau, (voice) (202) 418-0838 or Brian.Marengo@fcc.gov.

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APPENDIX**List of Licensees & Authorizations**

<u>Licensee</u>	<u>FRN</u>	<u>Auth Signature</u>	<u>Date</u>	<u>Call Sign</u>
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 Columbia Government, Metropolitan Police Department	0002088631	Karima Holmes	2/2/2018	WPED308
Dept. Hwy Safety & Motor Vehicles, Florida Highway Patrol	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. of Public Safety)	0001722982	Julio Peck	8/17/2017	WPXI720
Maryland State Police	0002134120	Gary Davis, Jr.	9/1/2017	WPLP844
Commonwealth of Massachusetts	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 Safety State 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 of State Police	0003438595	Samuel Gregory Diana	8/11/2017	WPFS619, WPUX388
North Carolina State Bureau of Investigation	0011016466	R. Christopher Laws	8/21/2017	WQBL588, WQGH385
Ohio, State of, Highway Patrol	0013859699	Maj. Shawn Davis	8/17/2017	WQDJ531, WQED841
Oklahoma Department of Public Safety	0017935958	Gene Thaxton	12/13/2017	WQJI506
Oregon State (OWIN)	0001556125	Robert Reish	8/17/2017	WQDD261
Pennsylvania, Commonwealth of 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 Law Enforcement	0005456629	Michael W. Naylor	10/06/2017	WQER759, WQGG795
Tennessee Bureau of Investigation	0014494165	Brad Truitt	10/09/2017	WQGL264, WQET845
Texas, State of (Dept. of Public Safety)	0001672419	Todd Early	8/23/2017	WPLT916, WPWF970
Utah Motor Vehicle Enforcement 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