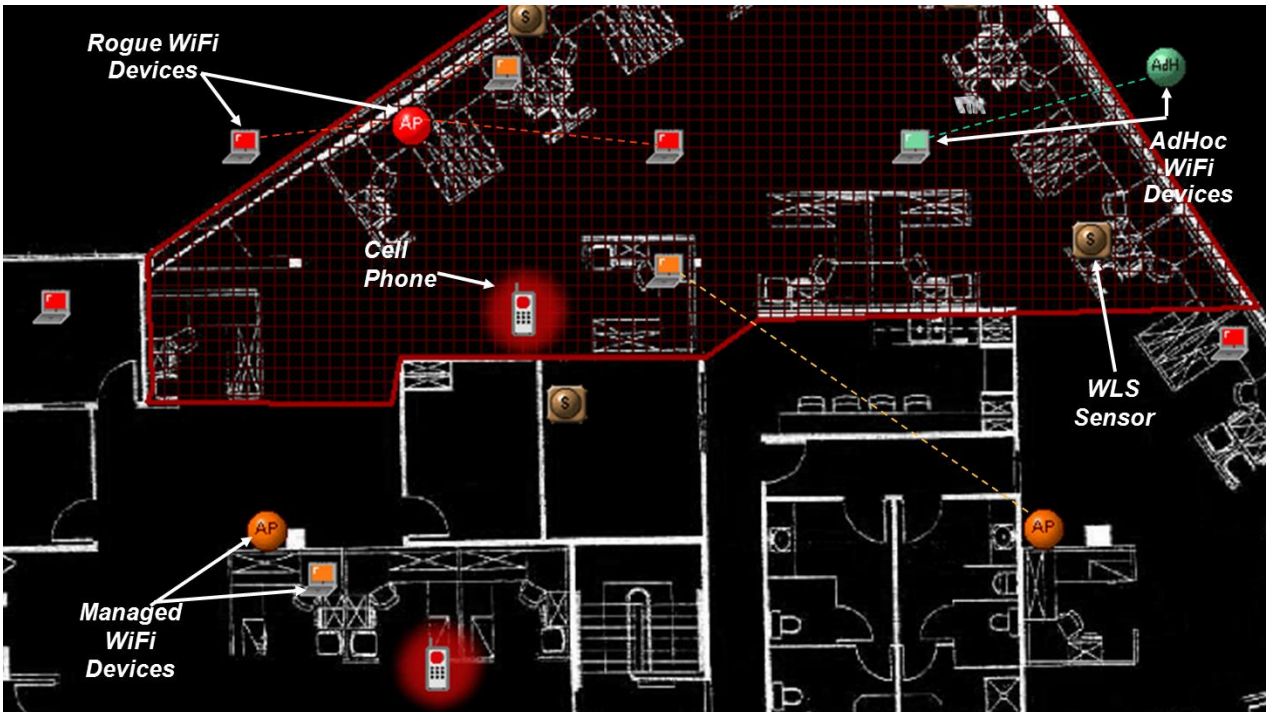
***AirPatrol Corporation Response to NTIA Docket No. 100504212-0212-01***

One of the most serious problems facing Correctional facilities today is the use of contraband cellphones. Prisons around the world struggle with this security issue and need effective solutions. Cell phone detection and location systems provide an effective method for eliminating cell phones within a prison without disrupting legitimate communications and without the need for waivers from Government agencies. AirPatrol Wireless Locator System (WLS) is one such detection solution which has proven its effectiveness within multiple prisons in the United States and Canada. WLS is a continuously monitoring Cellular and 802.11 Wi-Fi device locating system which immediately notifies security personnel of where and when a wireless devices is being used. Using cell phone location data from WLS, Corrections Officers can confiscate phones which can lead to valuable forensic data.

WLS monitors the airwaves 24 x 7 to provide a live facility-wide view of Cellular and 802.11 Wi-Fi devices at a single glance. With the ability to detect, locate, and characterize wireless devices with an accuracy of 3 meters, WLS enables security personnel to proactively identify potential threats and compliance issues. WLS is the ONLY system on the market to address multiple wireless threat vectors with a single unified system.




**WLS Manager screenshot showing locations of Cellular and 802.11 Wi-Fi devices on a floorplan**

New WLS options, such as the WLS Connect software application, WLS Rapid Deployment Sensor (RDS), and the WLS Analytics & Productivity Suite (APS) software application are drastically increasing the utility and usability of WLS. WLS Connect allows remote and centralized monitoring of geographically distributed WLS Sensor systems via the web-browser based WLS Connect console. Facility-wide and world-wide monitoring of WLS systems are achieved using WLS Connect. The RDS enables all the capabilities of standard WLS Sensors with the added benefit of a wireless mesh for sensor-to-sensor

connections, enabling rapid deployment for exercises such as temporary security audits and red-team exercises.


**WLS Rapid Deployment Sensor (RDS) next to a laptop running WLS Manager SW**

AirPatrol's Wireless Locator System (WLS) detects and locates cell phones within an area of interest based on the following types of wireless transmissions:

- as soon as a cell phone is powered on, it sends wireless signals to the local tower; WLS receives these signals and uses them to locate the phone
- when a phone is powered on but not in use, it sends periodic wireless signals to the local tower; WLS receives these signals and uses them to locate the phone
- when a phone is being used for a voice conversation, an internet browsing session, or to send/receive emails, text messages, or files, it sends wireless signals to the local tower which WLS uses to locate the phone.

Of the various solutions that exist, cell phone detection has distinct advantages over jamming and managed-service solutions. Major advantages of using AirPatrol WLS for Corrections include the following:

- WLS accurately locates Cellular and 802.11 Wi-Fi devices within correctional facilities
- WLS does not interfere with Cellular communications or Public Safety radio frequency bands and therefore does not interfere with legitimate communications
- WLS does not require Federal Communications Commission (FCC) permits or any other permits to deploy or operate
- WLS leads to the confiscation of contraband phones which can be exploited for forensic evidence of criminal wrongdoing.
- AirPatrol Rapid Deployment Sensor (RDS) can be deployed without the use of network cabling, greatly easing the burden of system setup and installation.

AirPatrol WLS has been deployed in multiple prisons in the United States and Canada. An example are recent pilots organized and supported by the Maryland Department of Public Safety and Correctional

Services (DPSCS). AirPatrol's effectivity in the pilots is described in the DPSCS reports titled, "Non-Jamming Cell Phone Pilot Summary, January 20, 2010" and "DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONAL SERVICES Overview Of Cell Phone Demonstration". These two reports are attached to this response and are also available online at Maryland DPSCS's website.

The contraband cell phone plague in US prisons needs to be addressed. However the use of RF jammers to stop cell phone calls can lead to the interruption of authorized wireless services within a community as well as within the facility itself where Corrections officials use cellphones. Fortunately, there are ways to stop contraband cell phone activities without using jammers.