

Open Research Institute, Inc.
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San Diego, CA 92130
21 April 2025

Federal Communications Commission
45 L Street NE
Washington, DC

In the matter of GN Docket No. 25-133 (Delete, Delete, Delete),

In reply to the comments from ARRL, the Amateur Radio Relay League,

[https://www.fcc.gov/ecfs/search/search-filings/filing/
104122962905678](https://www.fcc.gov/ecfs/search/search-filings/filing/104122962905678)

Open Research Institute, Inc. supports all of these comments, especially the deletion of baud rate, symbol rate, and bandwidth limitations (WT Docket No. 16-239), and the elimination of language that limits learning about and using digital codes. We agree with ARRL that the limitations in subsections (a)(1) – (a)(3) are obsolete and should be deleted and replaced with provisions based upon Sections 97.309(a)(4) and 97.309(b).

Michelle Thompson
ORI CEO