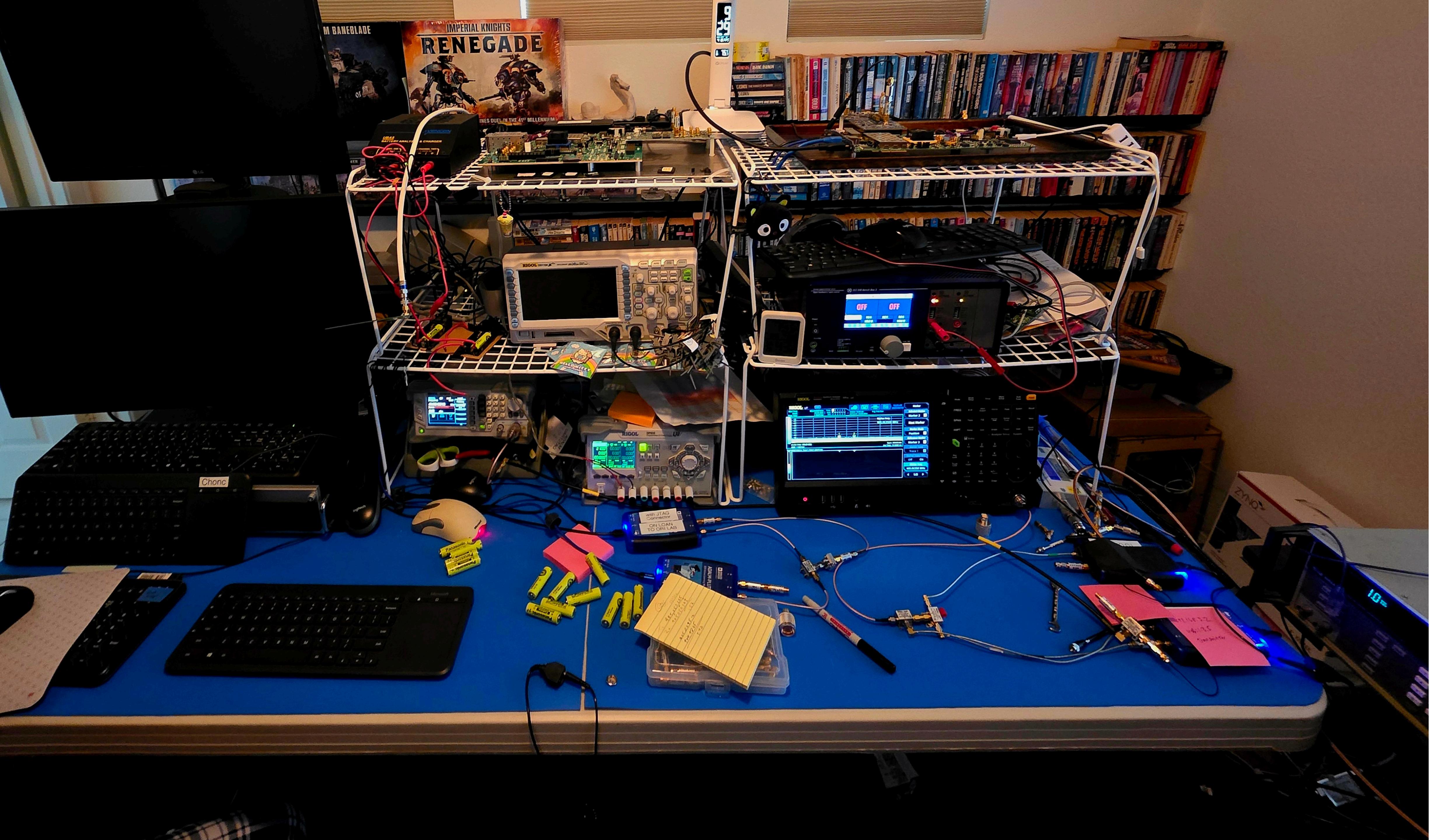


22 APRIL 2025

ORI PROJECTS MEETUP

Remote labs, Regulatory, and more





WHAT'S NEXT?

- Remote Lab South network back up and running
- Replace broken glass with laser cut acrylic
- We can use Remote Lab South computer to help fix performance issues in Remote Lab West

WIN WIN

- We are putting together a curriculum and project proposal for the major local universities: UCSD, SDSU, USD, and San Marcos. This is based on our existing Statement of Work for Haifuraiya.
- We propose the content that we are working on in a way that looks good for these schools, to the best of our ability, and offer to provide gear (computer and remotely accessible lab bench - colocated wherever works).
- We get a solid updated statement of work regardless of whether they bite.
- If this doesn't work, we follow through on the original decision to liquidate the lab equipment and put the money back into Operations Account.

25-133 PROCEEDING COMMENTS ARE UP

Comments are up!

<https://www.fcc.gov/ecfs/search/search-filings/filing/10421232017567>

<https://www.fcc.gov/ecfs/search/search-filings/filing/10421767517600>

Open Research Institute, Inc.
#1873 3525 Del Mar Heights Road
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

- REPLY COMMENTS OF OPEN RESEARCH INSTITUTE, INC

- Open Research Institute, Inc replies in support of certain comments filed by the Association of American Railroads (AAR) [1], WISPA [2], and Steven K. Stroh [3].
- Specifically, we support section II of the AAR comments requesting the removal of regulations requiring interference studies to protect television stations using Channel 10 and Channel 13.
- We also support WISPA's comments regarding Part 80 of the Commission's regulations requesting the same removal of interference studies. These regulations are outdated and based on a coast station use of AMTS that was never widely deployed. Furthermore, we support Steven K. Stroh's recommendation to delete 97.307(f)(13) which restricts amateur station emissions in 219-220 MHz (hereafter "219") from using more than 100 kHz of bandwidth. We take no position on other comments made by the AAR, WISPA, or Steven K. Stroh.
- We believe that our comments [4] serve to encourage wider use of AMTS spectrum by removing other burdensome notification regulations in Part 80 that require AMTS licensees to notify the American Radio Relay League and Interactive Systems of station locations. Our proposed removal of notification requirements for 219 in Part 97 serve the same purpose.
- The AAR observes that most Positive Train Control deployments are "[...] primarily located within railroad rights-of-way and generally away from households [...]".
- This necessarily limits the potential for harmful interference given we do not advocate for mobile use of 219 by amateur stations.
- Beyond documented Amateur Radio Service history in coexisting with primary users, we believe our proposed retention of many of the restrictions on amateur use (secondary status, reduced power levels, fixed stations, and digital emissions) will sufficiently reduce the possibility of harmful interference with AMTS licensees. In sum, we believe that our proposals, combined with those of AAR, WISPA, and Steven K. Stroh will lead to more efficient commercial and amateur use of 219-220 MHz. In keeping with the Commission's goal of removing regulations, all of these proposals can be implemented solely as rule deletions.
- [1] <https://www.fcc.gov/ecfs/search/search-filings/filing/10412030480052>
- [2] <https://www.fcc.gov/ecfs/search/search-filings/filing/104111661931041>
- [3] <https://www.fcc.gov/ecfs/search/search-filings/filing/10412237159703>
- [4] <https://www.fcc.gov/ecfs/search/search-filings/filing/10329271641887>

ARE MULTI-CARRIER DATA MODES ILLEGAL IN AMATEUR RADIO?

- Discussion PDF out on Slack and email list.
- Definition of emission types doesn't include multi-carrier data modes like OFDM.
- We're very interested in these modes.
- We need your comment and critique so please check your email or Slack, and if you aren't on our list or workspace, then please go to:
- <https://openresearch.institute/getting-started> and introduce yourself.