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Federal Communications Commission
45 L Street NE
Washington, DC

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

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 These regulations are outdated and based on a coast station use of AMTS that was never widely deployed.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>

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