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November 8, 2023

Marlene H. Dortch, Secretary  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

Notice of *Ex Parte* Presentation

**WT Docket No. 16-239**, Amendment of Part 97 of the Commission's Amateur Radio Service Rules to Permit Greater Flexibility in Digital Data Communications

Dear Ms. Dortch:

On October 25, 2023, the Commission released a draft Report and Order and Further Notice of Proposed Rulemaking in the above-captioned proceeding.<sup>1</sup>

ARRL, The National Association for Amateur Radio (ARRL) welcomes the proposed decision and Further Notice. In addition to the improvement to Amateur capabilities for public service, especially during hurricanes and other disasters, there also is chatter among radio amateurs on social media already discussing how the regulatory changes may enable experimentation with exciting new spectrum-efficient technologies and capabilities.

We make one suggestion for the Further Notice with regard to one band. The 219-220 MHz segment of the 1.25 meter VHF band is allocated to the Amateur Radio Service on a secondary basis solely for use by fixed point-to-point stations for forwarding digital messages. There is no symbol rate limit associated with this segment, but there is a 100 kHz bandwidth limit, 47 C.F.R. § 97.307(f)(13). Inasmuch as comment will be solicited on bandwidth limits for the other amateur VHF bands, including the 222-225 MHz segment of the same 1.25 meter band, we request that the 219-220 MHz segment be included in the discussion for possible change.

Respectfully,



David R. Siddall  
ARRL Washington Counsel

CC: Commissioners and WTB

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<sup>1</sup> FCC-CIRC231-05.