

1960 82nd Ave SE
Mercer Island, WA 98040
August 1, 2016

Re: WT Docket No. 16-239, RM-11708

Amending Part 97 to Permit Greater Flexibility in Data Communications

Dear FCC --

I am writing in support of the FCC's proposed changes to Part 97 as published July 28, 2016, which are well thought out.

I am an Extra class Amateur Radio Operator engaged in emergency communications. We live on an island in an earthquake prone part of the country (Washington state), and the community is deeply concerned and active in preparing for emergencies. Our ability to communicate through digital systems such as WINLINK, and especially long distances to reach outside a potentially broad disaster zone is key.

PACTOR is proving to be very valuable for these needs. However, Part 97 rules currently limit USA hams to PACTOR level 3, while level 4 is allowed in most every other country and offers significant performance advantages. I have level 4 capable equipment, but cannot use it only because of rules.

In addition, I support the FCC's decision not to include a bandwidth limitation, to encourage additional experimentation and technology development.

Thanks,

A handwritten signature in black ink, appearing to read "David Giuliani". The signature is fluid and cursive, with the first name "David" being larger and more prominent than the last name "Giuliani".

David Giuliani, WA6PXX

David@Giuliani.org