I am Dr. Maury Guzick, my call sign is W5IO. I have been a licensed amateur radio operator for 49 years, since 1969. I am a life time member of the American Radio Relay League (ARRL). I request that the FCC dismiss NPRM 16-239 immediately as it will harm narrowband users in the HF bands that we use today. Immediately reject the proposals in Docket 16-239 as currently written and revise it to be by "band segment" instead of "band width" or terminate the proceeding until an appropriate solution to the multiple problems can be devised. The reasons and rationale for this are noted below:

* The FCC has failed to address key issues that impact national security - all transmissions must be open before perpetrating more violations. NPRM 16-239 just legitimizes and further supports illegal operations happening already on the US amateur radio frequencies that travel across borders
* NPRM 16-239 does not offer any protection to narrowband users. Narrowband users must be protected in HF bands.
* The vital role Amateur Radio plays in our nation security and emergency communications will be adversely impacted by NPRM 16-239.
* The FCC has continued to ignore thousands of amateur radio operators who want NPRM 16-239 to be revised or rejected. This is a flawed proposal, that requires rework it to address the issues of mitigation of congestion, frequency sharing, and locating wide band transmissions inside it's own band segment, and the appropriate size of such segments in each proposed HF band allocation.
* The ONLY sure way to end the arguments about indecipherable transmissions is to perform an actual test using an SCS Pactor 7800, but it must be on ARQ mode, not FEC. The manual states that ARQ cannot be decoded per Ron Kolarik comment.