

September 25, 2006

The Honorable John M. R. Kneuer
Acting Assistant Secretary
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue, N.W.
Room 4898
Washington, D.C. 20230

Dear Mr. Kneuer:

The undersigned are pleased to respond to the NTIA's Notice of Proposed Rulemaking dealing with important matters that will facilitate the nation's final transition to all-digital television broadcasting in 2009. We salute the NTIA for its comprehensive approach to ensuring that free over-the-air television service continues to be available to consumers after analog broadcasts cease.

Never before in the DTV transition has such a broad-based collaboration of public-interest groups, trade associations and businesses come together with a common purpose and shared sense of commitment to the American consumer. That being said, we recognize the enormity of the NTIA's task in managing the digital-to-analog converter box coupon program and pledge our support to you and your staff.

While many factors are important, a well-managed consumer education effort is crucial to ensure the success of the digital transition. As was emphasized in a letter to you this summer, in order for this DTV transition to be successful, consumers at all socio-economic and age levels must be well-informed and primed to adapt successfully to the new technology.

This can only occur with a comprehensive, coordinated and harmonized national consumer education effort. In short, there must be clear and unified messages, disseminated widely across media and non-media outlets, and through such avenues as community centers, libraries, toll-free information lines and the Internet. Indeed, we must begin promptly and comprehensively to reach all American consumers with concise, coordinated, simple to understand information – involving a wide range of private and public stakeholders in such an important effort.

We share your commitment, as expressed in your testimony before the Senate Commerce Committee, "to make the DTV transition a success for all Americans." In a strong demonstration of our commitment, the undersigned have agreed to the attached Principles to Support a Successful DTV Transition, which we respectfully submit in response to the Notice.

Our sincere hope is that the NTIA will reflect these principles, based on the widespread agreement among our diverse organizations serving millions of American consumers, in its final rules governing the last important steps in the nation's DTV transition.

Sincerely,

Alliance for Rural Television

American Agriculture Movement

American Corn Growers Association

American Library Association

Association for Maximum Service
Television, Inc.

Association of Public Television Stations

Consumer Electronics Association

Consumer Electronics Retailers Coalition

Federation of Southern Cooperatives

Harris Corporation

International Brotherhood of Electrical
Workers

ION Media Networks

League of Rural Voters

LG Electronics USA, Inc.

National Association of Broadcasters

National Association of Farmer Elected
Committees

National Consumers League

National Farmers Organization

National Farmers Union

National Grange

Soybean Producers of America

Women Involved in Farm Economics

PRINCIPLES TO SUPPORT A SUCCESSFUL DTV TRANSITION

1. For the DTV transition to be successful, we urge NTIA to work cooperatively with the private sector and representatives of the public interest community to craft and implement a consistent and effective consumer education strategy that reaches all consumers – especially those consumers most likely to rely on over-the-air broadcasts – where they live and work.
2. All consumers, including persons with disabilities, should have convenient access to DTV consumer education information so that they may make an informed decision about how to continue receiving free over-the-air signals when all-digital television broadcasting commences in 2009.
3. To avoid duplication of effort and to ensure a wise allocation of Federal resources, we urge NTIA to continue working in close coordination with other Federal agencies, such as the Federal Communications Commission, that are providing consumer education and outreach services.
4. So that the converter subsidy and consumer education programs accomplish their statutorily mandated goals, we support NTIA fully availing itself of any and all authorized Federal funds that may be available to it.
5. To ensure the success of the coupon program for this specific government-subsidized product, converter equipment must be easy to install and use, be affordable and exhibit excellent reception performance. NTIA should follow the minimum performance requirements as agreed to and recommended by the broadcasters and manufacturers in the joint MSTV/CEA/NAB filing in this proceeding.
6. To maximize the utility and consumer acceptance of the coupons offered under the converter subsidy program, and to minimize fraud and abuse, we urge NTIA to make the coupons available as electronic coupon cards and other necessary means as proposed by the retail community.
7. To ensure all consumers' television receivers can continue to receive television service after the DTV transition, NTIA should make converter subsidy coupons available to the maximum number of households.
8. In addition to ease-of-use, cost and performance, energy efficiency is an important consideration, so we encourage NTIA to rely on the EPA's EnergyStar program for coupon-eligible DTV converter boxes.