

6. Retailers can choose whether or not they will participate in offering converter boxes to coupon users. There is no requirement that they must offer a selection of converter boxes. We would like to see safeguards to prevent their offering only one or a limited number that offer the highest profit, particularly in areas where there may be no competing retailers.

7. The NTIA proposes to require manufacturers to self-certify that their converter boxes meet standards, and invites comment on whether existing industry or government organizations can help speed testing/certification allowed in the time frame of this program. We would like to see WGBH's National Center for Accessible Media, a group that has been actively involved in digital TV captioning, funded to provide testing that ensures the devices will deliver proper captioning integrity.

8. The NTIA asks whether there should be a printed list of converter boxes approved as eligible, and asks where the list should be available -- on a website, or just left to a retailer, or with placards where the retailer sells the converter boxes. Particularly with our constituency, people who have hearing loss, there are often limited ways to receive information. We strongly favor having printed information on websites, and required of retailers at the location where converter boxes are on display.

9. The NTIA asks for comments about a consumer education program. We are particularly interested in having money allocated for this purpose to national consumer organizations serving people who are deaf and hard of hearing who specialize in providing consumer information. We recommend the Deaf and Hard of Hearing Consumer Advocacy Network, a coalition of 17 national organizations including the National Association of the Deaf and Telecommunications for the Deaf and Hard of Hearing, Inc. as well as the Hearing Loss Association of America and Alexander Graham Bell Association for the Deaf and Hard of Hearing.

Thank you again for this opportunity to provide comments.

Cheryl A. Heppner, Executive Director
Northern Virginia Resource Center for Deaf and Hard of Hearing Persons
3951 Pender Drive, Suite 130
Fairfax, VA 22030
www.nvrc.org

Empowering deaf and hard of hearing individuals and their families through education, advocacy and community involvement