

I am writing to you as a represent of a local coalition of senior care provider agencies in Houston, TX. The purpose of this coalition is to assist, with agency and volunteer resources, vulnerable seniors in upgrading to DTV where there are not other means (such as family) to ensure that the seniors carry through the coupon application process and installation of the converter box. We estimate that in Harris County, TX, the number of seniors requiring this assistance ranges from 3,000 to 8,000.

The coalition would like to comment on the proposed rule, The Household Eligibility and Application Process of the Coupon Program for Individuals Residing in Nursing Homes and Households that Utilize Post Office Boxes; Waiver. Specifically, we request that the coalition, and other such coalitions that may be formed in other parts of the country, be considered under this rule as "Other Senior Care Facilities". Though we do not have seniors in residence, we provide (as individual coalition members) critical support services such as Meals on Wheels to maintain the independence of our senior clients (over 60 years of age), who may be homebound and/or suffering from cognitive deficits, and are generally in disadvantageous economic circumstances. We envision a process of:

1. determining which seniors require assistance in the DTV conversion;
2. submitting electronic batch applications to NTIA for coupons on behalf of these seniors (this step has the approval of NTIA, but the specific technical details are yet to be concluded);
3. having the coupons sent to the coalition rather than to the seniors, to avoid loss of coupons;
4. bulk acquisition of converter boxes using these coupons;
5. installation of converter boxes by volunteers.

The obvious sticking point is step 3. However, we believe that the intent of the proposed rule change, allowing coupons to be delivered to a senior care facility administrator, applies equally to our senior clients and the coalition as to nursing home residents and their facility administrators.

Section I acknowledges that seniors:

"...constitute a vulnerable community that may rely on free, over-the-air television to a greater degree than other members of the public."

It further allows that:

"...residents of such facilities [nursing homes, etc] face cognitive, mobility, and economic barriers to requesting and using coupons. Many

nursing home residents would therefore likely require the assistance of another person to order a coupon, purchase the box for them using the coupon, and install the converter box."

The senior clients served by the coalition members include many individuals who meet the above description; the purpose of many of the coalition members' service programs is, in fact, to keep such vulnerable seniors living with as much independence as possible despite the economic, cognitive, and mobility issues they may face. We would argue that, in terms of the intended beneficiaries of the rule change, our clients are of a similar class.

A further issue raised in the proposed rulemaking is

"...whether information is readily available that would allow the agency to confirm that the individual making the coupon request (or on whose behalf the request is made) actually resides in a nursing home."

The coalition's clients live independently, in a household. The same level of information provided by the general public in the coupon application process is available for these clients. With the electronic batch submission of coupon applications, NTIA will be perfectly able to validate the individual senior's applications just as any other household's application. Further, as these applications come in batches from the coalition, it should be very easy to identify coalition seniors and to mail their coupons, if eligible, to the coalition as the NTIA would mail coupons to PO boxes or to nursing home administrators. Thus, unlike the proposed rule for nursing homes, the NTIA would not require SSNs for the seniors on whose behalf the application is filed.

To sum up, there is a significant population of seniors (and others) living with barriers to reliable and successful completion of the DTV conversion process, equal in scope and severity to those nursing home clients specifically identified in the proposed rule change. Given the kind of process our coalition is designing in cooperation with the NTIA, accountability and efficiency can be maintained in the coupon program while allowing local initiatives to assist vulnerable populations dependent on broadcast TV to participate in the DTV conversion. We request that coalitions and other organizations serving this vulnerable population of seniors be covered under this rule, with a waiver permitting eligible coupons to be delivered to the senior's representative rather than directly to senior's household.

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