

**Before the  
National Telecommunications and Information Administration  
Washington, D.C. 20230**

In the Matter of	)	
	)	
Implementation and Administration of a Coupon	)	Docket No. 060512129-6129-01
Program for Digital-to-Analog Converter	)	
Boxes	)	RIN 0660-AA16
	)	

**Comments Of  
Wal-Mart Stores, Inc.**

Kevin O'Connor  
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Wal-Mart Stores, Inc.

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September 25, 2006

\*Bar admission pending.

**Before the  
National Telecommunications and Information Administration  
Washington, D.C. 20554**

In the Matter of	)	
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Implementation and Administration of a Coupon	)	Docket No. 060512129-6129-01
Program for Digital-to-Analog Converter	)	
Boxes	)	RIN 0660-AA16
	)	

**Comments Of  
Wal-Mart Stores, Inc.**

Wal-Mart Stores, Inc. (“Wal-Mart”) respectfully submits these Comments in response to the National Telecommunications and Information Administration (“NTIA”) Notice of Proposed Rulemaking and Request for Comment in the above referenced matter.<sup>1</sup>

**I. GENERAL COMMENTS.**

Wal-Mart fully endorses and supports the comments filed by the Consumer Electronics Retailers Coalition (CERC) in this matter. As described in those comments, electronics retailers have the expertise and experience to evaluate a coupon program with an eye to consumer satisfaction, efficiency, cost, and fraud prevention. Wal-Mart urges the NTIA to take CERC members’ collective expertise in electronics retailing into account when reviewing CERC’s comments.

**II. ENERGY STANDARDS.**

Wal-Mart endorses the position on energy standards put forth by the Consumer Electronics Association (CEA) in their comments on this matter. As part of its mission to provide quality products to customers at the lowest possible cost, Wal-Mart believes that consumer electronics products should be energy-efficient, thereby lowering the consumer’s cost of ownership. Wal-Mart agrees with CEA that a uniform national standard such as those

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<sup>1</sup> *Implementation and Administration of a Coupon Program for Digital-to-Analog Converter Boxes*, Notice of Proposed Rulemaking and Request for Comment, 71 Fed. Reg. 42,067 (July 25, 2006) (“NPRM”).

implemented through the EPA's Energy Star program will serve both manufacturers and consumers better than an inconsistent patchwork of state standards. The EPA is developing an Energy Star standard for analog-to-digital television converter boxes which is scheduled for completion well before the proposed Coupon Program would begin. A state-by-state approach, by contrast, would add a layer of complexity to the Coupon Program and hinder the transition to digital television broadcasts.

Wal-Mart continues to believe in the principles behind its letter to the NTIA of late July. However, rather than recommending particular energy consumption standards at this time, we join with the CEA in supporting a uniform national standard achieved through Energy Star certification.

Respectfully submitted,

/s/ Kevin O'Connor

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