



ELECTRONICS

September 25, 2006

Mr. Milton Brown  
Office of the Chief Counsel  
National Telecommunications and Information Administration  
U.S. Department of Commerce  
1401 Constitution Avenue, N.W.  
Room 4713  
Washington, D.C. 20230

Dear Mr. Brown:

Samsung Electronics Co. (“Samsung”) is pleased to respond to the National Telecommunications and Information Administration’s (NTIA’s) notice of proposed rulemaking concerning the coupon program for digital-to-analog converters. This coupon program, established by the Congress for the NTIA to administer, is an important component of the nation’s transition from analog to digital television broadcasting. The program will help millions of Americans continue to view over-the-air television broadcasts on their current analog-only television sets after our nation transitions to all-digital broadcasting on February 17, 2009.

Samsung is fully committed to the U.S. transition to digital television. Samsung is the world’s leading manufacturer of televisions by market share, and we have the largest market share of digital televisions in the United States. We produce a wide variety of televisions with integrated digital tuners as well as digital set-top boxes. Next month, we will introduce the DTB-H260F ATSC digital set-top box, which incorporates the most advanced technology for receiving terrestrial digital television through an antenna—at a very moderate price. In 2007, we plan to introduce a lower-cost STB specifically for owners of legacy analog-only televisions, including those who will take advantage of the coupon program. These initiatives demonstrate our firm commitment to this market and to the digital transition.

Samsung supports the comments submitted jointly by the Association for Maximum Service Television, the Consumer Electronics Association, and the National Association of Broadcasters (the “Joint Industry Commenters.”) The Joint Industry Commenters have provided the NTIA with a consensus view of the most directly interested industries on how best to implement the coupon program to achieve its goals. We wish to emphasize three points in particular:

1. We applaud the NTIA’s intention to leverage the program’s consumer education spending by complementing the consumer education efforts of broadcasters, equipment manufacturers, retailers, consumer groups and other interested parties. The transition to all-digital broadcasting will be a great benefit to American consumers. Without sustained and effective consumer education, however, it also has the potential to confuse many people. Broadcasters in particular have a leading role to play through public service announcements over the airwaves, directly reaching the very consumers who will be affected by this transition.

2. The NTIA should make the coupons available to the maximum number of households, as authorized by Congress. The coupons should be provided in an electronic coupon format in order to facilitate consumers' use, while preventing fraud and abuse.
3. For the specific and unique circumstances of this government-subsidized converter program, in defining the technical capabilities and features of converters that qualify for the coupon program, the NTIA should ensure a minimum level of performance as described by the Joint Industry Commenters. Moreover, the NTIA should not preclude the inclusion of additional features and capabilities that improve the reception and display of over-the-air broadcast signals on an analog-only television.

Respectfully submitted,

John Godfrey  
Vice President, Government & Public Affairs  
Samsung Information Systems America, Inc.

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