Eligible U.S. Households

The NPRM raises a number of issues concerning the eligibility of households to participate in the DTV Coupon Program. These questions involve such issues as whether economic need should be considered in determining eligibility for the program, should the poverty level be used to determine eligibility, or whether there is another poverty benchmark that might be more relevant for determining eligibility for this program.

Supporting a means-tested program

Sodexho believes that, given the mandates of the program, as determined by Congress, it would be unfeasible to design a program that included a certification and eligibility process other than a household self certification that the household relies on OTA broadcasting in analogue spectrum. The DTV program, by statute, will be a one-off program, existing for a short period of time for a single purpose. Because the contracted developer of this system will not have an opportunity to amortize the significant start-up costs that this project will involve over a standard amortization period, such as five years, most of the cost will have to be expensed over the short life of the project. This will mean that the cost to serve each household that participates will be significant. The "mobilization" costs, rather than being spread over many years and many recurring transactions, will be born by a relative small volume of transactions. We estimate that the $100 to $160 million authorized by Congress for administrative expenditures on the project does not provide sufficient funding for an exhaustive eligibility or means testing process, given its temporary nature.

The one-off nature of the DTV Coupon Program is the economic dynamic that will drive the entire project. This is important to note when considering whether a means-tested eligibility metric should be employed to regulate participation in the program. Because if the cost of the system is barely fundable under the rules as proposed, the additional burden of a certification and eligibility system other than noted above would in all probability cost more than Congress has appropriated for this function.

From operational and financial standpoints, implementing a means test will require the design, development, testing and implementation of an eligibility subsystem. The software, hardware and training needed for this system could add another 15 percent to the overall cost of the system.

Even if the money were available for an eligibility subsystem, one would question the cost-effectiveness of building it. The General Accountability Office has concluded that the targeted households for this program "are more likely to have lower incomes compared to cable or DBS [direct broadcast satellite] households.[1] One can conclude from the GAO analysis that primary participants of the DTV Coupon Program will be lower economic households. Given this conclusion, Sodexho believes that building the infrastructure to disqualify households that in all probability would not participate in the program anyway is not cost beneficial. This would be true if the U.S. Census Bureau poverty level or any other similar metric were used for the test.

[1] Mark. L. Goldstein, Director of Physical Infrastructure Issues, General Accountability Office, "Digital Broadcast Television Transition: Estimated Cost of Supporting Set-Top Boxes to Help Advance the DTV Transition," Testimony Before the Subcommittee on Telecommunications and the Internet, Committee on Energy and Commerce, U.S. House of Representatives, February 17, 2005.

The employment of a means test might also call into question the poverty threshold that NTIA chooses to use. The U.S. Bureau of Labor Statistics alone, for example, calculates 61 different levels of poverty.[2] Within the federal government different agencies may calculate poverty differently. Should NTIA elect a means test for the DTV coupon program it will have to choose a metric by which to set the eligibility threshold - and be able to defend its use to consumers who may be disenfranchised by that measure but not by others that were not chosen as the yardstick for eligibility.

[2]Carolyn Bell Shaw, "What is Poverty?" American Journal of Economics and Sociology, April 1995.

Other factors to consider in coupon distribution

NTIA raises the issue of other factors to consider in distributing coupons if the number of requests exceeds the number of coupons, or, conversely, if the number of requests is low (i.e., should NTIA consider expanding eligibility if response is low).

If the number of requests for coupons is greater than the amount of money allocated by Congress for the DTV Coupon Program, NTIA would face a dilemma. It could either go back to Congress for a supplemental appropriation, or it could change program requirements midstream - neither of which would be an attractive solution. In the later case the limiting factor would be the $5,000,000 appropriated for program communications. This is a small sum, given the scope of the project. It is doubtful that there would be much money left over to communicate with the public a second time about any necessary program changes nationwide in the event that NTIA tightened up its requirements.

NTIA would face the same communications issue if the opposite were true. Having attempted to maximize responses through its limited communications budget initially, it would face the prospect of developing a low or no-cost communications program to communicate the expanded eligibility requirements to the public. In either case, it would be doubtful that NTIA would have the resources to effectively communicate the changes to the public. The result would be confusion and a loss of confidence in the program.

NTIA should also consider that changing eligibility requirements midstream would involve extensive operational changes - in software, training, and business processes. This would have to be done through a change order to the system vendor's contract, which would further raise the cost of the program. Such changes would also require extensive testing, including regression testing to see what effect the change would have on other system functions. In addition to the unforeseen cost, this would also delay a project that would be laboring under extremely tight timeframes already.

Having given considerable thought to the question "is there adequate funding available", Sodexho concludes, based on the information made available and our own research that there will be sufficient funding as follows.

The number of potential households who qualify for the subsidy if the eligibility criteria is that the household must rely exclusively on OTA analogue broadcasting is according to the GAO 21 million (with a 95% confidence), therefore:

21,000,000 X $80 = $1.68 Billion exceeding the available funding.

This calculation represents a 100% uptake of the maximum amount (2 x $40).

The following points illustrate why we believe there will be a significant reduction from the maximum potential stated above of claimed and redeemed coupons issued under this program:

1. Households who do not need a converter box will not (in general) make an application, apart from the fraudulent application they would need to necessarily make in order to obtain a coupon(s) being a discouraging factor. In order to derive a financial benefit the household would need to:
    a. Purchase a converter box and top up the purchase in cash as the box is likely to cost more than the $40 allowed per box.
    b. Find a market for the box (bearing in mind that anyone who needs this box would most likely be eligible to make a claim for coupon(s) themselves).
    c. Re-sell the now 2nd hand box (ebay© etc) hoping that they will earn more than the balance of the purchase price previously paid in cash.
2. The system as proposed restricts the use of the coupon to buy only one box with one coupon and not other goods, with strict controls of retailers and good cross-checking and management this is highly feasible.
3. The proposal for a robust application process to detect duplicate applications will prevent systematic fraud by a household.
4. From July 2007 all televisions sold greater than 13 inches include the necessary equipment to receive a digital signal. Any household making a purchase of a new TV will therefore be ineligible to receive coupon(s).
5. In our experience even when a coupon is claimed by a valid application there will be a factor of un-used coupons, in the case of the DTV program the shortness of the proposed "use by" date will exaggerate this effect.
6. The number of eligible households identified by the GAO (up to 21 millions), was determined from the status of television households in 2004, there will have been a significant number of households who will have purchased a new digitally enabled TV in the interim or subscribed to a DBS service or cable TV and thereby be ineligible.

Coupon Value and Use Restriction

NTIA, in the Notice, raises a number of issues with respect to the value of the coupon and how the coupon will be redeemed. They include:

- The value of the coupon & no-refund policy on the purchase of converter boxes
- Redemption of coupons at certified retailers
- Serial number for identification of coupons
- Use of electronic coupon schemes
- Other fraud fighting techniques

These issues should be considered separately.

The value of coupons & no-refund policy on the purchase of converter boxes

NTIA proposes a coupon with a value of $40. The use of the coupon will be restricted to the purchase of one converter box through the DTV Coupon Program. One coupon may be used for any one purchase (no accumulation of value allowed). Consumers will be prohibited from returning a converter box to a retailer for a cash refund or for credit towards the purchase of another item. In the case of malfunction an even exchange will be permitted. We believe this is consistent with the aims of the program.

Sodexho has reviewed these proposed rules and finds them reasonable for a restricted-use coupon program. Manufacturers, retailers or consumer groups may address the issue of whether the coupon amount ($40) is adequate to fulfill Congress' goal of assuring continued television access to all households after February 2009. However, as a coupon processor, the amount will have little bearing on the operation of the system, other than the fact that if the difference between the value of the coupon and the cost of the box is significant, it may affect application and redemption levels, and this may have an overall effect on the per-household redemption costs.

Redemption of coupons at certified retailers

The use of an "affiliate network" for redemption is always a requirement in restricted use coupon programs. These restrictions make it easier for the coupon process to wall off the system and limit the environment in which fraud can occur. The establishment of such a network is relatively straight forward given that the rules of the system are clear, fair and easy to implement by the retailer. The affiliate network also allows increased controls as retailers will have some responsibilities in guaranteeing an appropriate use of coupons. (For more information see page 39-46 RFI)

The set up of a network of certified retailers also facilitates the redemption process as participating retailers are already registered in the contractor's database when they claim for coupon redemption. The redemption process can thus be more efficient.

Serial numbers for identification of coupons

1. It is essential to include a unique reference on every coupon issued, only in this way can effective anti-fraud measures be taken by the system operator.
2. We do not recommend the use of a simple sequential serial number, we recommend the use of a unique non-sequential number generated automatically at issuance which includes in itself security measures known only to the coupon issuer (the use of a modular calculation to embed a check digit key is the preferred method).
3. If NTIA requires identifying a particular coupon with a particular sale, it will need an identification vehicle for the coupon.
4. The current "state" of the coupons issued must be systematically tracked.

   For example:
   - Coupons at rest - in vault storage
   - Coupons in transit, including
     - Coupons transported between printing and storage facilities
     - Coupons in the mail
     - Coupons after delivery but prior to purchase
   - Coupons in circulation
   - Coupons in remittance process
   - Coupons settled
   - Coupons expired

5. To accomplish any of these purposes it is necessary for the serial number to be machine-readable. This would mean the use of some type of OCR number, UPC code, magnetic stripe or MICR numbers.

(For more Information see page 36 RFI)

Electronic coupon cards

NTIA poses the question whether it should consider the use of electronic coupon cards. Sodexho currently operates coupon/electronic card-type programs in many countries. We have experience in paper coupon/voucher systems, electronic coupon programs, and electronic card schemes, as well as combinations of these technologies. As an operator of both paper and electronic systems we are technologically agnostic and feel qualified to respond to this question.

We believe that the use of an electronic card would be overkill on this project. Generaly electronic solutions are most appropriate if either of two conditions exists:

1. The benefit being disbursed is part of a multiple payment "purse" - e.g., more than one type of benefit payment on the same electronic card.

2. Subsidies being disbursed are part of a recurring periodic payment or benefit authorization—e.g. a child support payment or Medicaid authorization.

Neither of these two conditions exists here. In fact, as a single, one-off subsidy - never to be repeated - that will be valid for only three months following date of issuance, the DTV coupon will be a unique payment.

Some responders to this request may propose the use of prepaid debit cards - either "closed" - type cards similar to restaurant-issued gift cards, or "open" cards bearing the brand of a national or regional electronic payment network.

The advantage of such cards is that they are readily accepted at the point of sale. The disadvantages for a program like this are many. Principally, however, they impact cost and the ability to track fraud. The variable transaction costs would in all probability prove to be not cost effective, and there appears to be no reasonable way under this type of scheme to tie a product purchased to a particular card or cardholder. This could potentially open up the program to waste, fraud and abuse. As an analogy we would point to the problems with the FEMA-issued cards used briefly post Hurricane Katrina in 2005[3]. Analysis of card-usage patterns revealed that usage was not restricted to its intended purpose (disaster relief), but in a number of cases was diverted to non-intended usages. It would be difficult to develop a restricted-use debit card system that would be cost-effective and would meet the tight timeframes specified by Section 3005 of Title III of Deficit Reduction Act of 2005. For a one-off, restricted-use coupon system we would recommend a paper coupon scheme. (For more information see page 65 RFI)

[3] "Expedited Assistance for Victims of Hurricanes Katrina and Rita: FEMA's Control Weaknesses Exposed the Government to Significant Fraud and Abuse," GAO Report to Congressional Committees, pp. 3-4.

Other fraud-fighting techniques

There are three main places where waste, fraud and abuse (WFA) may occur in the DTV coupon program. They are:

- In the application process
- In the illegal duplication of coupons (counterfeiting)
- In the retail coupon redemption process

With regard to the application process, we think that the use of logical data comparison during the application process will reduce opportunities for fraud through duplicate issuance. This involves subjecting each application to automated analytics that qualify it as a unique application based on certain demographic criteria such as family name, location, zip code, etc. Please see the following section on **Application Process** for more information.

With regard to the illegal duplication of coupons, there are a number of security techniques that we recommend specifying for the printing of the coupons. These can include any of the following:

- Bar codes
- Holograms or optically variable devices (OVDs)
- Serial numbers (discussed previously)
- Thermo-reactive ink
- Fluorescent ink
- Silver line
- Intaglio printing
- Counterfoils

(For more information see page 28-29 RFI)

We think that Congress has already taken a big step in reducing fraud opportunities through counterfeiting by limiting the value of the coupon to $40. While the aggregate value of the coupon program could approach a very significant $1.5 billion, this amount will be distributed over up to 42 million coupons each worth $40. Because of the sunk cost of counterfeiting, this distribution of value probably makes systemic forgery economically unfeasible. This would be similar to the U.S. Agriculture Department's federal Food Stamp Program, prior to the conversion to debit cards, where the maximum value of any food stamp coupon was $10. To the best of our knowledge, from the 1960s to the 1990s (when the U.S. Department of Agriculture began aggressively converting the paper coupon program to debit cards) systemic counterfeiting fraud was never a problem because the billions of dollars of annual issuance were limited by coupons in denominations of $1, $5, and $10.[5]

Baking security features like micro-line printing or holograms into the coupons will make them expensive to counterfeit. It is doubtful that a fraudster will incur this cost when the return is so small.

Finally, in the redemption process, NTIA has again limited its potential downside by proposing to certify retailers. Sodexho currently uses a system of "affiliate networks" for its coupon/voucher and card systems. This results in a contractual business relationship between the coupon system contractor and the retailers who redeem the coupons. This "know your customer" approach limits legal accessibility to the coupons and makes it most likely that any redemption fraud will be limited to known retail affiliates where it is most easily investigated. This should substantially protect NTIA.

Also, statistics show that in the US 87% of products similar to DTV converter boxes are sold through 5 main retail chains, therefore education, control audits and on-going training can be well managed and effective.

(For more information see page 39 RFI)

[5] "Waste and Abuse in the Administration of the Food Stamp Program," Craig Beauchamp, U.S. Department of Agriculture, Testimony before the U.S. House of Representatives Committee on Agriculture, Subcommittee on Nutrition and Foreign Agriculture, page 78.

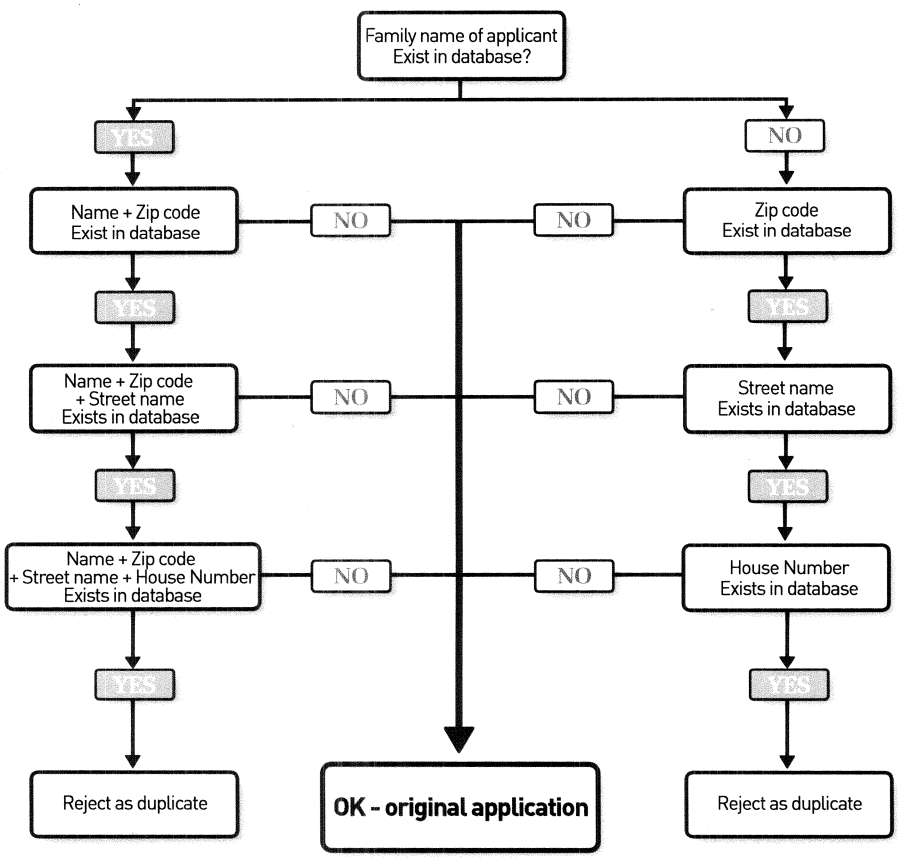
Application Process

We agree that a household self certified system of eligibility based on the criteria outlined in the NPRM appears to be the most cost-effective way of screening original applications, thought needs to be given to what if any sanctions will apply in the event that an incorrect eligibility statement is made whether intentional or not.

As stated in the previous section, the application process is a primary concern in any type of restricted-use system because the system contractor runs the risk of inadvertently admitting unqualified consumers into the system and thereby making them eligible for benefits. In fact, duplicate applications account for a significant amount of fraud in many benefit-distribution schemes.

As implied by NTIA to reduce the occurrence of this we recommend the systematic use of a logical data comparison and analysis tool. Through the use of such automated analytics, each individual application can be tested according to a number of criteria common to all of the applications, such as name, surname, street number, street, town, zip code and if possible social Security number. As each step of this test is applied to every application, it is either rejected as a duplicate or admitted to the system as legitimate.

The following logic flow diagram shows how this could work:



Following the logical path each application will either be accepted as original or rejected because its data pattern duplicates a previously approved application. We believe that the application process for some benefit program, means-tested or not, is a significant source of WFA. An automated logical data comparison process at the front end can substantially reduce any duplicate applications being approved, meaning one household address as defined can only receive a maximum of 2 coupons valued at 40 $ per coupon.

The media by which the application is received is irrelevant in the process of checking for duplication or eligibility. We would recommend the use as far as is possible the use of electronic and phone applications to capture the data, as this is the most cost effective way.

Concerns expressed by NTIA in the context of WFA

The security of any system of benefit delivery is one of the key components of the system design. The mitigation of risk should be considered at each logical step. While theoretically it may be possible to design a system which is for all practical purposes immune to waste, fraud and abuse (WFA), a cost-benefit analysis of each element of the system should be performed in order to make the system operable, cost-efficient and able to deliver the intended benefit while remaining accessible and not overly burdensome for all the stakeholders of the system.

Considering the potential for WFA it is useful to separate the analysis into three principal elements:

1. Physical security
2. Data and system security
3. Process security

Physical security overview

From the very beginning of the life of a coupon to its final destruction at the end of the coupon life cycle it is useful to think of the coupon as if it were a cash currency.

The following factors must be analyzed and a strong and durable system developed to match the associated risks.

- The premises on which all processes are carried out must be highly secured with pass protection on each of the main function areas, personnel must be limited to access only the areas necessary for the correct operation of their role.
- Each main function area should be under camera 24/7 with offsite storage of daily tapes of operations.
- If possible no personal belongings should enter the working areas and all personnel should be subject to search (providing this is legal in the respective country).
- All visitors, visiting contractors or others who do not regularly work in the facility must be accompanied at all times and not given access to any of the main production and storage areas.
- High specification alarm and security system to be installed including time locked vault for finished item storage and interlocked access doors the building.

- Design of the coupon itself to contain a sufficient number of discreet security features to make counterfeiting difficult and un-attractive.
- Selection of security printing facilities to produce the basic back print of the coupon (back print means all the elements of the coupon which are not personalized at a later stage in the process when personal details, security code, expiration date and so on may be added).
- Authorization process for ordering and validation of stock of back printed coupons.
- Transport means from security printers to pre personalization storage facilities.
- Reception at delivery point with checks and verification process to validate number and details of consignment.
- Storage of the coupons including limited access rights to storage area for personnel involved in the operations. Apart from security against theft, fire and un-authorized access, the area used for secure storage must also be controlled for humidity and temperature.
- At each subsequent stage of the process and at every time the area for storage is accessed by personnel accurate and time logged records must be maintained.
- The relationship between physical stock, recorded stock, finished product must be maintained and audited at each production run and in any event at the end of each production day. Any damaged or unusable backing paper must be controlled and destroyed in line with the security policy. The overall aim is to ensure that every single coupon (often numbering tens of millions) must be accounted for and recorded as to its status, whereabouts and condition.
- Deliveries should be made in unmarked packaging and be sent at various intervals during the week avoiding the concentration of deliveries on any one day.

Data and system security overview

The accurate measurement and recording of the business processes in a secure and resilient way is of the utmost importance if the system itself is to remain secure against WFA. The ability to know without doubt or fear of compromise the exact "condition" of a coupon is the only way to maintain effective control.

The following are examples of coupon "condition:"

- Data entered but not printed
- Printed but damaged in production
- Printed ok in storage before delivery
- In dispatch area for preparation for delivery
- In transit
- In circulation
- Lost in transit
- Stolen
- Void due to damage in transit
- Received for reimbursement
- Read and cross checked into database
- Authorized for payment
- Paid

The list above is a sample of the "conditions" possible for a coupon. In fact, Sodexho has evaluated that there are at least 27 "conditions" of a coupon and for each the system must be able ensure that the business can control the flow of the funding associated with each coupon. The essential point is: it must be impossible to pay the face value of the coupon to a retailer more than once.

Apart from system design in its functionality the following issues must be adequately addressed in the data security:

1. Compartmentalized access to the data and system.
2. Rolling access codes to the system access.
3. PC's used should not be equipped with recording devices and not connected to the internet.
4. Where access to the internet is necessary then a high specification firewall and access control system must be in place.
5. Data back ups are taken at least every day stored off site in a secure facility.
6. The whole database should be mirrored off site to enable a business continuity in the event of a catastrophic event at the main facility.
7. Professional penetration tests should be conducted frequently.

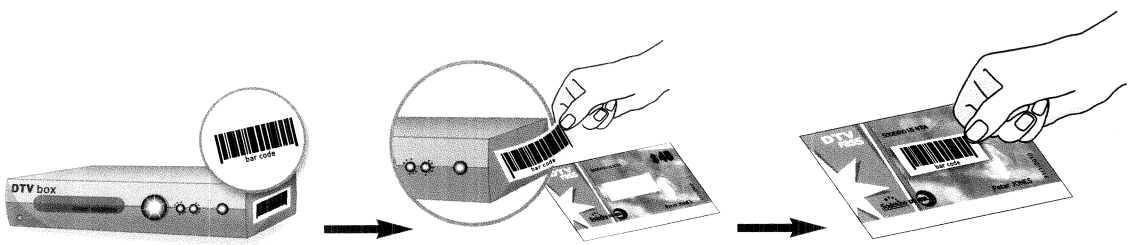
Process security overview

By process security we mean the transaction that takes place between the beneficiary and the retailer and in the case of the NTIA program the requirement to ensure compliance to a set of rules including:

- Converter boxes that meet the NTIA specification
- One coupon one converter box
- Two coupons per household
- No cash refund or credit.

Process security involves applying sound operational controls to all business processes. The key will be an ability to match a particular coupon with a particular converter box purchased with that coupon. This one-to-one match is the only effective way to reasonably assure that any coupon was used for its intended purpose and not diverted to some other action.

We suggest specifying that participating manufacturers provide the DTV coupon contractor with a database of "bona fide" serial numbers of each converter box manufactured and this be used as part of a cross check process before reimbursement. This would involve having the manufacturers agree to affix a simple bar code sticker to each converter box package. At retail purchase, the cashier would affix that bar code sticker to the coupon being used, effectively creating a 1:1 record that that particular converter box was purchased using that particular coupon.



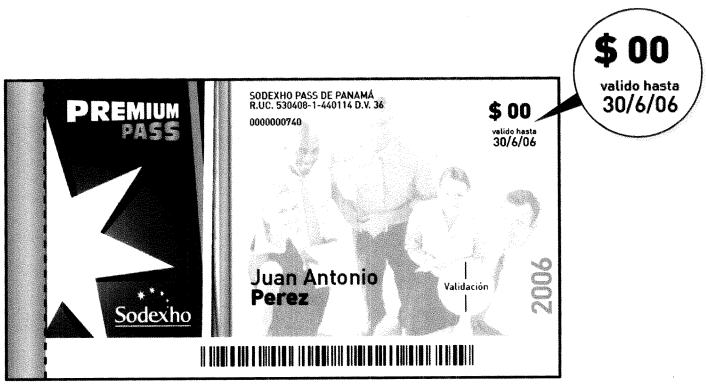
Upon remittance to the contractor, the two bar codes on the coupon would be read to validate that the box was eligible and that the coupon was used to purchase it. There may be other schemes that can create a 1:1 record; however, we believe that this is a simple and effective process.

Coupon Expiration

The Act specifies that a coupon will expire within three months, which is one technique for reducing opportunities for WFA, since millions of coupons will expire at different times.

We believe that it is safe to assume that a first-class envelop containing the coupon(s) and associated material will arrive anywhere in the continental U.S. within three days. We recommend using this standard and assume the expiry date is the date the coupon was issued 3 months plus three days. Most consumers are use to dealing with mailing deadlines, such as when they mail payments. For this to gain consumer acceptance, it would be important to clearly mark coupons with expiration dates. Again consumers and retailers alike are used to this approach in commercial coupon and rebate programs.

We further recommend that the retailer be given 1 month beyond the printed expiration date to effect return of used coupons to the contractor for reimbursement.



Expiration date

Digital-to-Analog Converter Box

NTIA raises the question of whether there exists an industry or governmental organization engaged in activities that can help speed development of testing/certification processes within the timeframe allotted by the Act. We believe it is advisable, given the significant expenditure of public resources, to secure some sort of imprimatur for the devices that consumers will purchase for the program.

There are a number of independent laboratories that perform independent testing for the telecommunications industry. These include Elliott Laboratories, SwRI, Underwriters Laboratories, and others. We recommend using a laboratory accredited by the American National Standards Institute (ANSI), which is recognized by the National Institutes of Science and Technology (NIST) as an accrediting organization for telecommunications equipment testing laboratories.

We recommend that NTIA creates a testing methodology, even to the point of maintaining a select list of laboratories that the agency has approved to test the converter boxes according to technical requirements and the requirements of the Act. Once approved this information should be disseminated to consumers. It should be the responsibility of contractor to include this data with its coupon mailings. The contractor should also provide point-of-purchase materials for retailers that specify the boxes certified for the program. Certification should be done prior to coupon distribution in order to minimize the cost to the program of re-printing and distributing this information.

The proposed communication tools on eligible converter boxes to consumers mentioned in the NPRM are efficient ways we are accustomed to use in our restricted-use coupon programs.

Retailer Certification

We agree with NTIA that retailers should be certified by the contractor to participate in the DTV coupon program. Creating legal obligations through a contract is an important way to reduce opportunity for fraud, by limiting the endpoints at which retail fraud can occur.

The contractor's responsibilities in this area should be:

- Marketing the program to retailers
- Contracting with participating retailers
- Training retailers
- Providing assistance to retailers through the life of the coupon program
- Adjudicating disputes with retailers

The business process of certifying for various functions is long established in the retail community. For examples, food retailers certify and contract with state governments to be lottery agents, agreeing to certain business processes in return for the right to vend Lotto games or tickets to the public. Various types of retailers contract for the right to be money transmitter agents, such as for Western Union® or other services. We believe that retailers will be willing to contract for this program - provided that the operational and financial requirements are minimal and do not interfere with their current business processes, and that there is sufficient financial gain.

The only way feasible, given the requirements of the Act, to certify retailers is to have them self-certify. This is similar to the way that the U.S. Agriculture Department certifies food retailers to participate in the Food Stamp Program. However, retailers must agree to accept certain responsibilities in return for the right to participate in the program. Fulfillment of these responsibilities must be consistent with retailers' existing practices or retail participation will probably be limited, which would also limit consumer access to the program.
(For more information see page 45 RFI)

A program that relies heavily on manual record keeping, requires additional personnel to administer, or sets remittance guidelines to which they cannot adhere, will in all probability limit retail participation. It should be recognized that the use of a coupon at all constitutes another form of tender for which most retailers are not equipped. This alone is an intrusion on their point-of-sale practices which may create some initial discontent among retailers. For example, most electronics retailers are more used to the rebate model which requires very little input from them, as opposed to the coupon model, which requires them to count, bundle and transmit coupons - and then wait for reimbursement. However because of the programs limited life, a coupon program will be more easily accepted than an electronic solution.

For these reasons it is important that the business processes instituted for the DTV coupon program be as non-intrusive as possible, and that the back end processes be as highly automated as possible.

Consumer Education

NTIA solicits views on the most effective way to provide consumer education about the DTV coupon program.

There are two types of consumer education that will be necessary for this program: informing consumers about the program and then informing them on how to use their coupons.

With respect to the latter, we believe it is sufficient for consumers to receive information along with their coupon(s) which explains how and where to use the coupon(s). This should be supported by a telephone help desk function as well as a website that contains supplemental information or a tutorial.

In the case of forward marketing to consumers about the program, Congress has constrained NTIA with a statutory limit on communication spending. The $5 million may not be sufficient to conduct a robust advertising campaign to support the launch of the program, even using such techniques as public service announcements. For example, it is doubtful if an awareness campaign produced through the non-profit Ad Council would qualify for a PSA campaign, even if cloaked in the concept of homeland security as Title III of the Act is. The DTV conversion program may not meet the Ad Campaign threshold test of a pressing social issue, and its limited duration may also disqualify it.

Absent that, $5 million to support what amounts to a national rollout may not be sufficient. There are several creative ideas that NTIA or its contractor may want to consider. These include:

- Enlisting the support of Congress. Congressmen have franking privileges which are used to communicate with constituents. At no time is this more evident than prior to elections. NTIA may wish to consider a campaign that would provide copy and text for Congressmen who may wish to contact their own constituents directly to inform them of the $40 that they have authorized for consumers. Most communiqués from Congress are read by constituents if received directly into the home.
- Working with other federal agencies. The DTV conversion contractor should work directly or through an agency with the demographic data that has already been gathered on the potential consumers for this program (those that rely only on analog signals for television). The contractor should seek to work with agencies that communicate frequently with consumers, such as the Social Security Administration. The goal is to use other agencies to channel the message directly to affected consumers, even if only through posters placed in intake offices.
- Working with NGOs. The contractor should also work closely with non-governmental organizations including community-based organizations (CBOs) to agree on ways to market the program to those demographic groups most likely to use it.

- Working through local media. While there may not be enough money for a national campaign, there may be enough to work through local media, especially radio on a public information campaign within key geographic or demographic parameters. Radio, because of its narrowcast approach, can provide information to targeted audiences in a cost-effective manner.

However, while these techniques may certainly help, they is no substitute for a penetrating national campaign that has both breadth and scope. Nevertheless, working with the constraints of the Act, they may be some the creative solutions that will be required to sell the message of the DTV coupon program.
(For more information see page 47 RFI)

Finally, as a database of targeted eligible households does not exist for the DTV Coupon Program, it won't be easy to focus communication efforts on these people exclusively.
Broad multi-channel and multi-media communications programs at national and local levels will be an important way to reach them.