

June 8, 2008
Department of Commerce
National Telecommunications Information Administration

47CFR Part 301

[Docket Number 080324461-8462-01]

RIN 0660-AA17

Attn: Meredith Baker Acting Assistant Secretary, NTIA

Dear Ms. Baker:

In the Deficit Reduction Act of 2005 in section (v) (Listed below) it states that the funds for the sales of the analog spectrum shall be deposited in the Treasury this, the month of June, 2008. According to the public records related to the sale of this spectrum the auctioned brought in nearly 20 billion dollars. Since over 66% of the current budget (or \$890,000,000) for this transition has currently been consumed by the coupon program would it not be appropriate to reexamine the end dollar amount actually needed for this transition? We are aware that approx 500 million remains from the initial 1.5 billion budget. An offer to review the needs for the NTIA was presented to you via a letter received this past May 16, 2008 by a concerned group from our honored US Congress. This letter outlined their questions, requests and concerns as related to the topic and docket number listed above.

(v) ADDITIONAL DEADLINES FOR RECOVERED ANALOG SPECTRUM-
Notwithstanding subparagraph (B), the Commission shall conduct the auction of the licenses for recovered analog spectrum by commencing the bidding not later than January 28, 2008, and shall deposit the proceeds of such auction in accordance with paragraph (8)(E)(ii) not later than June 30, 2008.

In any set of broad circumstances that require immediate consumer awareness and action that must transpire to complete the process, it may be best explained in a production format. I have always felt that each of the states should have city taskforces set-up to reach these remote, rural or confined citizens who will need to apply for their coupons for the needed converter boxes. Each taskforce would align with the local Colleges and Universities. In these facilities lies a vast resource of energy or students. This is the only type of energy that can get this grassroots Senior/rural/nursing home production campaign accomplished. Unfortunately there are few guarantees in life. The window of opportunity is closing with each passing day. It is for this reason that we should have 2 separate taskforces in place. One taskforce should be strictly for the seniors in remote or LPTV areas and one taskforce that would supervise all other for the all OTA network areas.

After reviewing the Federal Register, Vol. 73, No.80, Proposed Rules we should also examine the need for documentation and verification of the individuals requesting coupons. Could we, for statistical purposes, have 2 forms required? Form # 1 is designed for the *Nursing Home Administrators*. The nursing home administrator must electronically sign for the information packet that will be sent nationally to all nursing homes and assisted living centers. This electronic signature device can be presented by the postal worker to the nursing home administrator at their facility or their local PO. Within the forms envelope sent by the NTIA and received by the nursing home administrators, will be a set of instructions for return of the barcode envelop they have received from the NTIA via US Postal mail. This form #1 could have up to 20 individual nursing home recipients requesting coupons from the NTIA. A completed Form #1 could then be mailed with the pre-printed barcode.

This barcode not only designates the location of the nursing home and/or center, but also represents a prepaid envelop to any negate costs from Nursing Homes and includes all mail pieces that arrive or are sent to each facility from the DOC/NTIA.

The NTIA will cover this cost for all items mailed to all senior facilities and/or Nursing Home or whatever business name may apply to these institutions. The funds covering these costs will be issued on behalf of 'The Digital to Analog Transition Senior and Nursing Care Fund.' A 1 Billion dollar budget can be set aside for this grant and can be dispersed for postal expenses, office staff, equipment and all basic travel costs to assure this grassroots effort for our seniors follows a path of success. This fund or grant can be separate from the current DTV budget since the rules and parameters for seniors living in or near rural facilities requiring the use of POB's can differ drastically from the ordinary consumer needs or requests. The funds can be allocated for the postal expense and for the hourly rate of any local college or other part-time assistance as may be needed to accumulate coupon application information. These students can be aligned to the NTIA to establish NTIA remote office representation. This form #1 is for large to medium sized Nursing Homes and/or combined with Assisted Living Centers in rural or major cities.

The envelop barcode could also be used as a tracking number for coupon delivery by the US Post Office. This tracking could ensure the pick-up of all POB coupon orders as an electronic signature was obtained from the assigned nursing home administrator or their representative for the PO to keep on file for DOC auditing, if necessary.

The comparison of signatures from the initial receipt of the barcode envelop packet to the final electronic signature for the packet of coupons mailed could fulfill a security need for the NTIA for fulfilling the submitted requests from the form #1. Since the PO is a Federal Agency the signature records will have a more secure and direct path to the NTIA for auditing, if necessary.

Form # 2 Local College and university students are hired as 'Senior Initiative Leaders' for DTV. *The Senior Initiative Leaders* will use a traveling group of college students to reach more remote senior facilities or nursing homes or any other institution name under this category. This grassroots group of students would have 1-2 Road Managers.

The Road Managers could be local retired military or inactive handicapped military. It could be a great boon to the self-esteem for our returning soldiers to have a leadership function for our valued seniors. It would also lessen the threat of fraud since these individuals are loyal to the federal government. Each unit of 4-8 student groups would take portable kiosks into nursing homes to acquire the necessary data and to validate the individual needs of these facilities. The data contained within the kiosks could be basic personal data for each senior known to be at this facility. Each completed coupon request requires an electronic signature to be captured. The Administrator or representative of the senior or the senior themselves can be the requested electronic signature that is captured. The accumulation of this updated data may be of great future benefit to other government agencies and could even off-set costs for the future 2010 census. In remote areas often times individual televisions are not economically feasible. All senior facility categories need additional attention in so far as the structured rules for the DTV transition and the coupon program.

Protecting our seniors and all others that fall under this category should be an American initiative. No citizen of the United States should be barred from the right to public access to over the air broadcast television. No one participating in the success of any of these actions assisting the progress of the senior and rural citizens to apply and receive coupons and instructions obtaining the needed converter boxes should be expected to do this for free. All involved should be paid for their dedication to assisting in the success of the largest media transition in the history of man.

I would like to commend your office for their pursuit in achieving a fair path to assist our valued seniors, handicapped and remote citizens and for allowing our suggestions.

These and other concepts may be available upon written request from the NTIA or other government office to the person listed below.

Thank you for your time.

Best Regards,
D. L. Sylvester
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