

**From:** "Terry Knab" <terry@knab.org>

To whom It may concern:

There are several 'flaws' in the system used to approve coupons for DTV converters, which I will detail below. These items need to be fixed in order to avoid disenfranchising viewers immediately.

1. Apartment dwellers. If a building is divided into apartments, the NTIA will deny coupons to anyone else who lives in that building even if they live in a different apartment. If an address is given as 123 Main Street Apartment 2 and they're the first to apply, they get coupons, Apartments 3 and 4 won't. This is a MAJOR flaw since some addresses have tens to hundreds of apartments. This also applies to Rural Route addresses (they're slowly being phased out, however NTIA's database isn't aware of this) Also, some apartments are located ABOVE a business. Applying for a coupon for an address that has a business on the bottom floor causes the application to be rejected since it's a 'commercial' address, when in fact there are legitimate residents there.
2. PO Boxes. In some areas of the US, the USPS will NOT deliver mail to some addresses. Period. Colorado is a great example of this. Near Aspen, no mail delivery is possible. NTIA will NOT issue coupons to people in those situations. This also goes for urban areas. Some people have opted to go to a PO Box to avoid theft of mail and the subsequent identity theft.
3. Group home addresses. Why not have it so group homes can apply for converters for residents? Or flag those addresses that are licensed group/nursing homes by the appropriate state agencies to permit them to apply?