



City of Seattle

Gregory J. Nickels, Mayor

Department of Information Technology

Bill Schrier, Director and Chief Technology Officer

Via Email: coupon@ntia.doc.gov

June 5, 2008

Milton Brown
Office of the Chief Counsel
National Telecommunications and Information Administration
1401 Constitution Avenue, Room 4713
Washington, DC 20230

Re: 47 CFR Part 301
Docket number: 080324461-8462-01
RIN 0660-AA17
The Household Eligibility and Application Process of the Coupon Program for
Individuals Residing in Nursing Homes and Households that Utilize Post Office Boxes;
Waiver

Dear Mr. Brown:

Thank you for the opportunity to comment on the National Telecommunications and Information Administration's Notice of Proposed Rulemaking (NPRM) regarding the Digital-to-Analog Converter Box Coupon Program and its applicability to nursing homes and other similar residential care facilities. These comments respond specifically to the request for information on points raised in the NPRM. Approximately 125,000 Seattle residents -- among them our most vulnerable populations -- rely on analog broadcast programming, so issues related to the digital transition are vital to us.

1. Nursing Home Residents

We are pleased that the NTIA has acknowledged the special circumstances posed by residents of nursing homes and support your efforts to create an exception within the converter coupon program. We urge you to extend special consideration to all types of group homes, not just nursing homes. Seattle has many types of group homes, including those for the mentally ill and physically challenged, as well as student occupants of boarding homes and fraternities and sororities, for example. Accordingly, we recommend that the NTIA approve the proposed rule and extend it to include all types of group living accommodations.

B. Administration of Coupon Program

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1. Although we understand that there are institutional concerns over fraud and waste, we are equally, if not more, concerned about the privacy issues that group home members raise over the requirement to submit social security numbers in order to qualify for the coupons. Since the NTIA accepts a simple affidavit from the rest of the population, we believe that our most vulnerable citizens should not be discriminated against by having to meet a stricter qualifying requirement. If anything, we should be trying to help them access the coupons rather than creating additional burdens.

2. and 3. We also oppose the requirement that good Samaritans who elect to help nursing home residents apply for a box must give up their privacy by submitting their social security number. We do not believe we should penalize or provide disincentives to those engaged in helping our most disadvantaged citizens. Again, we recommend that these helpers be able to submit a written affidavit, just as the average applicant is permitted to do. Further, we urge the NTIA to consider a process in which a group home administrator could “batch” applications by submitting one application for all its residents at the same time.

C. Applicability of Other Provisions of the Coupon Program Rule

Although we understand that the NTIA has limited resources, we would encourage you to review the limitation on reimbursing nursing homes for common area televisions. For our poorest residents, these common area TVs are the only sets available. We therefore recommend that the program also permit reimbursement for TVs that serve all residents in group homes.

Thank you again for the opportunity to respond and for your good work to extend the coupon program.

Sincerely,

Tony Perez, Director
Office of Cable Communications