



DoC NTIA Digital-to-Analog Converter Box Coupon Program NPRM

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Key Policy Objectives for Establishing Program Rules

- Primary Program Rule Objectives:
 - Implement program consistent with congressional intent
 - Resolve ambiguities necessary to facilitate Program Execution
 - Protect the Consumer
 - Ensure Program Success
- NTIA should avoid codifying rules governing all aspects of the program
 - Achieve an effective balance between establishing a program framework and necessary requirements, without unnecessarily curtailing discretion in program implementation
 - Allow the Program Administrator to adopt best practices and effective cost tradeoffs for the program, in consultation with NTIA as appropriate

Critical Program Rules

| Critical Program Rules | Program Considerations |
|---|--|
| <ul style="list-style-type: none"> ▪ Define "U.S Household" <ul style="list-style-type: none"> - What defines a household? - What are the specific eligibility requirements | <ul style="list-style-type: none"> ▪ Establishes program eligibility requirements and eliminates ambiguity in program administration ▪ Key to achieving program objectives ▪ Cost management ▪ Drives waste, fraud and abuse controls and complexity |
| <ul style="list-style-type: none"> ▪ Converter Box Technical Standards and Specifications <ul style="list-style-type: none"> - Minimum Systems Requirements - Functional Capabilities - Energy Standards | <ul style="list-style-type: none"> ▪ Establishes minimum quality standards to protect consumers ▪ Provides equipment consistency ▪ Establishes known baseline for manufacturer compliance ▪ Contributes to controlling Converter Box selections decisions and cost |
| <ul style="list-style-type: none"> ▪ Coupon access and use restrictions and limitations <ul style="list-style-type: none"> - Application Process (issuance date, applicant data requirements, application medium) - Restricted coupon use (returns/ exchanges) - Retailer redemption (time limits, data needs) - Coupon Expiration (time limits, grace periods) | <ul style="list-style-type: none"> ▪ Eliminates ambiguity in program administration ▪ Facilitates program administration ▪ Key to managing waste, fraud and abuse ▪ Ensures program is accessible and user friendly for consumers |
| <ul style="list-style-type: none"> ▪ Other Considerations <ul style="list-style-type: none"> - Reapplication for coupons (lost or expired) - Address how/when expired coupons are returned to inventory - DTA Convert Box Functionality needs to address antenna requirement | |

Areas That Should be Left to Program Administration Discretion (Not Specified in Rules)

- As a general guideline, rules that drive how it will be done should be avoided unless mandated by the Act (e.g. receive coupon via USPS)
- Examples
 - Coupon Format (Paper vs. Plastic)
 - Coupon Application Process and Methods
 - Waste, Fraud and Abuse Methods and Techniques (Serial Numbers, Watermarks)
 - Retailer Certification

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