



**FCC INTERGOVERNMENTAL ADVISORY COMMITTEE**

September 11, 2008

Honorable Kevin J. Martin  
OFFICE OF THE CHAIRMAN  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Digital Television Transition Comments and Recommendations of the FCC  
Intergovernmental Advisory Committee

Dear Chairman Martin:

The Intergovernmental Advisory Committee (IAC) was appointed by the FCC to provide feedback on various issues coming before the FCC, particularly the transition to digital television. In that capacity, the members of the IAC have met monthly by teleconference and in person on a quarterly basis to discuss, among other matters, DTV issues, opportunities and challenges. Thank you for the opportunity for the IAC to provide your office with input on the upcoming transition from analog to digital television that the nation is preparing for this February 17, 2009. The following comments are a distillation of those discussions, concerns and recommendations.

Upon review of the FCC's digital television transition and outreach plan, the IAC has recognized a number of issues, about which members will here provide additional input to the FCC. Among these issues are: oversight of retailers and stakeholders, outreach through Tribal

## INTERGOVERNMENTAL ADVISORY COMMITTEE

Letter to Chairman Kevin J. Martin

Re: Digital Television Transition

September 11, 2008; Page 2

governments to Native Americans, clarification of equipment requirements, clarification of requirements for translator stations, coordination of messages, test locations, preparedness information, and targeted outreach to lower income, minority and non-English speaking communities. This recommendation will also contain specific agencies the IAC has identified as potential outreach partners for the FCC, as well as comments with regard to Congressional issues. The IAC also supports the suggestions in July 23, 2008 resolutions adopted by the National Association of Regulatory Utility Commissioners (NARUC).

### Continued enhanced oversight and enforcement over retailers and other stakeholders

The IAC is concerned about the distribution of misinformation to the public. The IAC urges the FCC to monitor advertisements, public service announcements and other messages for any incorrect information, and to take action to correct that information should its distribution occur. Further, the IAC anticipates increased demand for converter boxes during the holiday season, and suggests the FCC be wary of misinformation in advertising efforts during this time period.

### Outreach through Tribal governments to Native Americans

The IAC sees the opportunity for the FCC to outreach to Native Americans through their Tribal government representation. To this end, the IAC recommends the FCC partner with Tribal governments to reach their Native American constituencies. Inter-Tribal meetings and Tribal conferences should be utilized as venues for DTV presentations by FCC staff. In addition, the FCC should make targeted information available to Tribal media sources, such as magazines, radio, information packets and pamphlets for door to door distribution. Lastly, the IAC recommends the FCC work to assist Tribal governments with bulk purchasing of converter boxes, to then be distributed to their constituencies.

### Clarification of equipment requirements

In working with municipal, county, state and Tribal communities, IAC members have become aware of concerns held by the public with regard to the electronics equipment necessary to continue receiving over-the-air signals, as well as confusion about the interaction of that equipment with other electronic devices. Further, the IAC is concerned that this confusion may

## INTERGOVERNMENTAL ADVISORY COMMITTEE

Letter to Chairman Kevin J. Martin

Re: Digital Television Transition

September 11, 2008; Page 3

lead consumers to spend more than is necessary for the DTV transition due to misunderstanding. On this matter, the IAC recommends the FCC work to inform consumers and outreach partners about antennae requirements for televisions with converter boxes, and what, if any, problems may occur with the interaction of converter boxes and antennae or other electronic devices such as DVD players or VCRs. To achieve this end, the IAC recommends the FCC encourage outreach partners, electronics manufacturers and retailers to become educated on this issue, and to encourage DTV town halls to educate consumers on these potential issues.

Converter box installation may also pose difficulty for many of the target communities identified by the FCC, particularly the elderly. The IAC recommends the FCC consider outreach efforts to assist with converter box installation. The IAC suggests an information hotline to answer consumer questions regarding converter box installation. The FCC should ensure the hotline is adequately staffed during the transition. In addition, the IAC recommends the FCC pursue voluntary assistance from various social service and other organizations to help with information distribution or in-home visits. Further, the IAC recommends the FCC post online instructions for converter box installation and prepare a troubleshooting video for downloading. Lastly, the FCC should demonstrate proper converter box installation at informational town hall meetings.

### Clarification of requirements for translator stations

With the understanding that one of the target audiences for FCC DTV outreach is residents of rural areas, and that many rural areas are served by translator stations, the IAC recommends the FCC clarify the requirements for the DTV transition with regard to translator stations. Further, the IAC recommends that the FCC disseminate this information to translator stations and rural areas in advance of the February 17, 2009 deadline should the translator transition have a different timeline.

### Coordination of messages

The IAC has concerns regarding the timing of messages about DTV transition, i.e. Public Service Announcements, and the availability of resources, i.e. converter boxes, in various

## INTERGOVERNMENTAL ADVISORY COMMITTEE

Letter to Chairman Kevin J. Martin

Re: Digital Television Transition

September 11, 2008; Page 4

geographic areas. The IAC recognizes that there is little coordination of messages between the FCC, broadcasters, retailers and other outreach partners, and suggests the FCC make efforts to lead coordination of these messages. The IAC recommends that these efforts be particularly increased from December 2008 through February 17, 2009.

### Test locations

The IAC recommends the FCC encourage additional test locations for DTV transition. This includes, but is not limited to, additional geographic areas, specific time periods of digital broadcast testing, and specific channels reserved for digital broadcasting as test locations.

### Preparedness information

The IAC recommends the FCC create a preparedness checklist for DTV transition and distribute it to all outreach partners. This checklist should be targeted to consumers, and should serve as a reference tool for outreach partners such as social service agencies. The checklist should include information for both pre- and post-transition.

### Targeted outreach to lower income, minority and non-English speaking communities

Among the communities identified by the FCC and the IAC with the greatest need for outreach are lower income, minority and non-English speaking groups. The IAC recommends the FCC market to these groups via mainstream means, but also through targeted media outlets such as radio. The IAC recommends the FCC partner with nationally syndicated radio shows directed to these target audiences to provide information and education over the air. Further, the IAC suggests FCC staff be available on air for listeners to call in with questions.

### Outreach partners identified by IAC

National League of Cities

United States Conference of Mayors

National Association of Counties

INTERGOVERNMENTAL ADVISORY COMMITTEE

Letter to Chairman Kevin J. Martin

Re: Digital Television Transition

September 11, 2008; Page 5

American Library Association

National Association of Black College Administrators

National Association of Black Elected Officials

NCLR (National Council of La Raza)

American Hospital Association

National Governors Association

(encourage Executive Orders and communication through departments)

National Newspaper Association

National Education Association

Association of America's Public Television Stations

Congressional issues

The IAC recommends FCC anticipate transition problems and make a request to Congress for flexibility with regard to timing. With the understanding that February 17, 2009 is the mandated deadline for the DTV transition, and recognizing that the transition is imperative to public safety, the IAC suggests the consideration of obtaining such flexibility for an emergency scenario.

The IAC also recommends the FCC request additional funding from Congress, to be released to the FCC for additional outreach upon reaching a percentage of current funds expended. This release of additional funds would take effect prior to all of the current FCC funds being expended in order to prevent a lapse of funds for DTV outreach efforts.

NARUC Resolutions

Additionally, the IAC lends its support to the suggestions in DTV resolutions adopted by

INTERGOVERNMENTAL ADVISORY COMMITTEE

Letter to Chairman Kevin J. Martin

Re: Digital Television Transition

September 11, 2008; Page 6

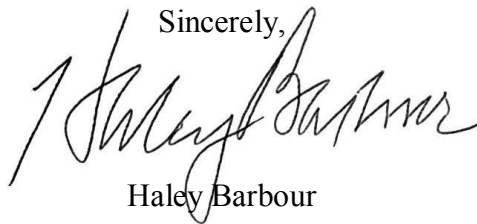
NARUC on July 23, 2008. The NARUC resolutions call on Congress to examine NTIA's Digital-to-Analog Converter Box Coupon Program, monitor inventory information from certified retailers, and suggest extending the duration of converter box coupons. NARUC also encourages the FCC to adopt additional consumer education efforts to help consumers successfully transition to digital TV. The NARUC Resolutions are available at NARUC's website<sup>1</sup>.

Conclusion

The IAC appreciates the work FCC staff has done in preparation and acknowledges the detailed technical information readily available on the internet at DTV.gov. However, there appears to be a possible disconnection between the information available and the ability of those communities who need it the most to access that information. Greater effort should be made to connect the communities in need with the tools and information available to make a seamless transition. Lastly, the IAC reiterates the need for increased efforts to reach the communities in need from December 2008 to February 17, 2009.

The IAC will continue to monitor progress of the DTV transition plan and to work with the FCC to improve Tribal, lower income, minority and non-English speaking community outreach and education about the transition. Thank you once again for the opportunity to participate in this important process and for the Commission's consideration of the above comments and recommendations.

Sincerely,



Haley Barbour

Chairman

---

<sup>1</sup> The resolutions are available at the following URLs.

<http://www.naruc.org/Resolutions/CA%20DTV%20Education%20Efforts.pdf>

<http://www.naruc.org/Resolutions/CA->

[2%20Resolution%20on%20Consumer%20Awareness%20of%20the%20DTV%20Transition\\_July\\_07.pdf](http://www.naruc.org/Resolutions/CA-2%20Resolution%20on%20Consumer%20Awareness%20of%20the%20DTV%20Transition_July_07.pdf)