



Department for Professional Employees, AFL-CIO

September 27, 2006

The Honorable John M. R. Kneuer
Acting Assistant Secretary
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue, N.W.
Room 4898
Washington, D.C. 20230



Dear Mr. Kneuer:

The Department for Professional Employees, AFL-CIO (DPE) represents 10 affiliated national unions with nearly one-half million media professionals, artists, technicians and support workers who are involved in all phases of news and entertainment programming. In addition, the 23 labor organizations which comprise our alliance represent over four million union households with nearly 10 million television viewers in them who are consumers of news and entertainment programming. In the past, our organization and these unions have worked with the Federal Communications Commission on a range of communications issues including DTV.

The DPE is pleased to respond to the NTIA's Notice of Proposed rulemaking dealing with important matters that will facilitate the nation's final transition to all-digital television broadcasting in 2009. We salute the NTIA for its comprehensive approach to ensuring that free over-the-air television service continues to be available to consumers after analog broadcasts cease.

While many factors are important, a well-managed consumer education effort, is crucial to ensure the success of the digital transition. In order for this DTV transition to be successful, consumers at all socio-economic and age levels must be well-informed and primed to adapt successfully to the new technology.

This can only occur with a comprehensive, coordinated and harmonized national consumer education effort. In short, there must be a clear and unified message, disseminated widely across media and non-media outlets, and through such avenues as community centers, libraries, toll-free information lines and the Internet. Indeed, we must begin promptly and comprehensively to reach all American consumers with concise, coordinated, simple to understand information – involving a wide range of private and public stakeholders in such an important effort.

The DPE shares your commitment, as expressed in your Testimony before the Senate Commerce Committee, "to make the DTV transition a success for all Americans." In a strong demonstration of our commitment, DPE agrees with the enclosed Principles to Support a Successful DTV Transition, which we respectfully submit in response to the Notice.

Our sincere hope is that the NTIA will reflect these principles, based on the widespread agreement among our diverse DPE unions representing tens of millions of American consumers, in its final rules governing the last important steps in the nation's DTV transition.

Sincerely,

Paul E. Almeida
President

Enclosure

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ACTION OFFICE FYI

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MBa, DM

SUSPENSE DATE —

REMARKS: #83

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PRINCIPLES TO SUPPORT A SUCCESSFUL DTV TRANSITION

1. For the DTV Transition to be successful, NTIA should work cooperatively with the private sector and representatives of the public interest community to craft and implement a consistent and effective consumer education strategy that reaches all consumers — especially those consumers most likely to rely on over-the-air broadcasts — where they live and work.
2. All consumers, including persons with disabilities, should have convenient access to DTV consumer education information so that they may make an informed decision about how to continue receiving free over-the-air signals when all-digital television broadcasting commences in 2009.
3. To avoid duplication of effort and to ensure a wise allocation of Federal resources, NTIA should continue to work in close coordination with other Federal agencies, such as the FCC, that are providing consumer education and outreach services.
4. So that the converter subsidy and consumer education programs accomplish their statutorily mandated goals, NTIA should avail itself of any and all authorized Federal funds that may be available to it.
5. To ensure the success of the coupon program for this specific government-subsidized product, converter equipment must be easy to install and use, be affordable and exhibit excellent reception performance. NTIA should follow the minimum performance requirements as agreed to and recommended by the broadcasters and manufacturers in the joint CEA/MSTV/NAB filing in this proceeding.
6. To maximize the utility and consumer acceptance of the coupons offered under the converter subsidy program, and to minimize fraud and abuse, NTIA should make the coupons available in a wide range of formats, including but not limited to paper vouchers, electronic coupon cards with unique serial numbers, and other necessary means as proposed by the retail community.
7. To ensure all consumers continue to receive the same degree and quality of television service after the DTV Transition, NTIA should make converter subsidy coupons available to the maximum number of households.
8. Because inconsistent state regulation of energy consumption may stifle cost-effective production of DTV converter equipment and frustrate the policies of the federal subsidy program, NTIA should work closely with the EPA's EnergyStar program for coupon-eligible DTV converter boxes.