

November 17, 2006

Mr. Milton Brown, Deputy Chief Counsel  
National Telecommunications and Information Administration  
U.S. Department of Commerce, Room 4713  
1401 Constitution Avenue, NW  
Washington, DC 20230

Dear Mr. Brown:

Booz Allen is pleased to provide a summary of our *ex parte* contact with NTIA. The purpose of our meeting was to share Booz Allen's views and request clarification regarding the proposed rules to implement and administer a coupon program for digital-to-analog converter boxes. Specifically, we addressed the following elements of the proposed rulemaking.

Section B. Coupon Value and Use Restrictions

- Question: Will the amended rule specify a requirement for either a paper coupon or an electronic coupon card; noting that each approach has unique risk profiles, costs, and benefits?

Section C. Application Process

- The coupon program may benefit from the inclusion of requirements to protect personally identifying information (PII).
- NTIA may benefit from defining class of service for coupon(s) sent via the United States mail (e.g., first class).
- Self-certification is a sufficient approach to meeting NTIA's eligibility requirements and may reduce risk to the coupon program.

Section F. Retailer Certification

- Question: From NTIA's standpoint, do any legislative or other potentially imposed restrictions prevent retailers from selling converter boxes and redeeming coupons via Internet-based sales?

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Section G. Consumer Education

- Increasing the current spending cap of US\$5,000,000 may achieve greater consumer awareness and participation of eligible U.S. households.

Should you require additional information or clarification, please feel free to give me a call at (703) 917-2149 or respond by e-mail at [gosling\\_roberta@bah.com](mailto:gosling_roberta@bah.com).

Sincerely,

Roberta Gosling  
Principal

BOOZ ALLEN HAMILTON INC.