

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**National Telecommunications and Information Administration**  
**Certification of Digital-to-Analog Converter Box (Manufacturers)**  
**OMB CONTROL NO. 0660-XXXX**

**A. JUSTIFICATION**

**1. Explain the circumstances that make the collection of information necessary.**

The National Telecommunications and Information Administration (NTIA) is required to create a program to provide coupons for consumers to purchase digital-to-analog converter boxes. These converter boxes are necessary for consumers who wish to continue receiving broadcast programming over the air using analog-only television sets after February 17, 2009 - - the date that television stations are required by law to cease analog broadcasting. Without converter boxes, consumers with analog only television sets will be unable to view television broadcasts over-the-air. To help consumers who wish to continue receiving broadcast programming over-the-air, Congress authorized NTIA to create a digital-to-analog converter box assistance program (See Title III of the Deficit Reduction Act of 2005, Pub. L. No. 109-171, 120 Stat. 4, 21 (Feb. 8, 2006)). As part of this program, eligible U.S. households may obtain a maximum of two coupons of \$40 each to be applied towards the purchase of digital-to-analog converter boxes. Among other things, the Act states that households may obtain coupons by requests pursuant to the regulations between January 1, 2008 and March 31, 2009. That Act also requires NTIA to make the coupons available by the United States Postal Service. The Act also prohibits the use of two coupons in combination towards the purchase of a single converter box, and requires all coupons to expire 3 months after issuance.

The Conference Report accompanying the Act expresses an expectation that NTIA will promulgate regulations governing the implementation of the coupon program. NTIA published a Notice of Proposed Rulemaking (NPRM) establishing the parameters of the coupon program and describing the rights and responsibilities of the interested parties. In order to implement the program, it is essential that certain information is collected from consumers, manufacturers, and retailers.

This supporting statement has been prepared to discuss the Final Rule and to explain the circumstances that warrant the collection of information from manufacturers. As part of the coupon program, manufacturers that wish to participate in the program must submit a notice of intent to the NTIA at least three months prior to submitting test results and sample modes of converter boxes. The notice shall include a brief description of the proposed converter box, including permitted as well as required features, and the date which the proposed converter box is expected to be available for testing. The notice of intent shall supply the name, title, and address and phone number of an individual responsible for the manufacturer's submission. The manufacturer is then required to submit the converter box and the test results to NTIA.

**2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.**

The notice of intent will be submitted to NTIA only once to determine the manufacturers that will participate in the program. The test results and the converter box will be sent to NTIA and the Federal Communication Commission (FCC) to ensure that the converter box meets NTIA's specifications.

NTIA will not provide the public with the information received from manufacturers, thus NTIA's information quality guidelines do not apply. Manufacturers, however, will provide information to the FCC which the FCC may make available to the public. The FCC has its own information quality guidelines as well as procedures of complaint or appeal decisions regarding information dissemination (<http://www.fcc.gov/omd/dataquality/>).

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.**

The collection of this information does not include the use of automated, electronic, mechanical or other technological techniques or other forms of information.

**4. Describe efforts to identify duplication.**

The information collection is unique to this program and is not available from another source.

**5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.**

It is not certain whether this information collection will involve small entities. A Paperwork Reduction Analysis regarding the impact of this rule on small entities was prepared as part of the rulemaking. No comments filed by small entities in response to the NPRM indicated that small businesses would be burdened by the Final Rule or the collection of information

**6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

This Federal program cannot exist without this information collection. As a result, the overall digital transition will be a failure and millions of households that rely on over-the-air broadcasts will lose access to television after February 17, 2009.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

The data collection is consistent with OMB guidelines.

**8. Provide a copy of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

The final rule, RIN 0660-AA16, will be published to coincide with the submission of the information collection. A proposed rule soliciting public comment was published on July 25, 2006 (Vol. 71, page 42067). No comments were received concerning the manufacturing of the converter boxes.

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

NTIA will not provide gifts or payments to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.**

The notices of intent collected from manufacturers will not be made public. The notices of intent provided by manufacturers may contain trade secrets and/or competitively sensitive information. NTIA will treat the notices of intent as confidential.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

This information collection does not contain any questions of a sensitive nature.

**12. Provide an estimate in hours of the burden of the collection of information.**

It is estimated that it will take the 10 respondents 1 hour and 15 minutes each to provide this information.

**10 responses X 75 minutes = 12.50 (13) hours**

**13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in #12 above).**

The respondents will not incur any annual cost burden as a result of this information collection.

**14. Provide estimates of annualized cost to the Federal government.**

The Act provides a ceiling of the costs that the Federal government may incur as a result of this program. The total cost to the government is estimated at \$990 million, which may be increased to \$1.5 billion. The annual cost has not been determined and is based on consumer demand for the coupon.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I.**

The requirements included in the Final Rule are new so there are no program changes or adjustments to any reporting or recordkeeping hours or cost burden.

**16. For collections whose results will be published, outline the plans for tabulation and publication.**

NTIA will not publish the data collected in non-aggregated form. NTIA may report total numbers of notices of intent, the number of models, or other non-specific data regarding the manufacturers' participation in the program.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.**

NTIA will display the expiration date on all relative documents (paper and Internet).

**18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.**

No exceptions are requested.

**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

The collection of information will not employ statistical methods.