

SUPPORTING STATEMENT
U.S. DEPARTMENT OF COMMERCE
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION
NTIA DOCUMENT LOGO AND MESSAGE TESTING FOCUS GROUPS
OMB CONTROL No. 0660-XXXX

A. JUSTIFICATION

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

Congress directed the National Telecommunications and Information Administration (NTIA) to create and implement a program to provide coupons for consumers to purchase digital-to-analog converter boxes. (*See Title III of the Deficit Reduction Act of 2005, Pub. L. No. 109-171, 120 Stat. 4, 21 (Feb. 8, 2006)*). These converter boxes are necessary for consumers who wish to continue receiving broadcast programming over the air using analog-only television sets after February 18, 2009 - - the date that television stations are required by law to cease analog broadcasting. On March 15, 2007, NTIA published a Final Rule establishing the parameters of the Coupon Program and describing the rights and responsibilities of interested parties. *See 72 Fed. Reg. 12097 (March 15, 2007)*. Among other things, the regulations permit consumers to submit applications to NTIA for coupons beginning January 1, 2008. *See 47 C.F.R. section 301.3(b)*.

An effective consumer education campaign, including the development of a campaign identity, messages, and consumer materials, is essential to the Coupon Program. Of particular importance is the development of an application for consumers that is easy to understand and to submit to NTIA. In an effort to ensure that the materials and messages developed for the campaign resonate with all target audiences, these items will be tested with representatives from targeted audiences. The targeted audiences, identified as the more reliant on over-the-air television, include the following: (1) economically disadvantaged households; (2) rural residents; (3) minorities; (4) people with disabilities; and (5) seniors. Representatives from the target audiences will participate in “focus groups” to assist NTIA in determining the clarity of the message; identifying difficulty or ease in presenting and receiving pertinent information; and improving the presentation of the information.

This emergency review request is necessary to conduct the targeted audiences focus groups.

2. Explain how, by whom, the frequency, and the purpose for which the information will be used. State whether NTIA's Information Quality Guidelines apply, if so, confirm that the collection complies with the Guidelines.

Nineteen (19) focus groups are scheduled in eight cities and via teleconference. Five additional participants will be interviewed who are deaf or hard of hearing for a total number of 176 participants. The information will be collected by Ketchum, Inc., a global public relations firm,

that is leading the consumer education program as a subcontractor to IBM, NTIA's prime contractor. NTIA awarded a contract to IMB in August 2007 to administer the diverse operational elements of the Coupon Program. The information will be used to develop a consumer application as well as other consumer education materials related to the Coupon Program.

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 focus groups will be conducted live and via teleconference. The focus groups will be audio and video taped for an accurate account of what was said in the groups and interviews for the purposes of analyzing the information and writing a report.

NTIA will not permit anyone outside the project to see, listen, or read any information recorded. All that participants say will be kept private as allowed by law. NTIA will not include participants' names in the report. The tapes, recruiting information, and any of the research materials associated with the project will be destroyed by March 2008,

4. Describe efforts to identify duplication.

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

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

This information collection does not involve small businesses.

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

If focus groups are not used to collect this information, the consumer education campaign as well as the application process may be confusing to consumers. As a result, households that rely solely on over-the-air broadcasts may not apply for coupons, and thereby 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 the Federal Register citation information for the 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 or to obtain their views on the availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A draft copy of the Federal Register notice, that will be published soliciting public comment, is included in the supplementary documents in the ROCIS system.

9. Explain the decision to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

NTIA will make payments to respondents for participation in the focus groups. Payment will range from \$75 to \$100 per participant, depending on the market, and is necessary to attract and retain diverse participation in the focus groups. Typically, more than nine participants are recruited, since there may be no-shows, but everyone is paid who shows, regardless of whether they are selected to participate.

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

The data collected as part of these focus groups will not be published or used for purposes other than developing a consumer application and an effective consumer education campaign. NTIA's contractors must comply with the Privacy Act of 1974. (See, Pub. L. No. 93-579, 88 Stat. 1896 (Jan. 21, 1974)).

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.

The focus group survey 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 352 hours to conduct the focus groups.

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

Nineteen (19) focus groups with a maximum of 9 participants in each group total 171 potential participants. Ketchum will also be talking to five additional people (hearing impaired) via individual interviews because the focus group setting will not work for this population. Focus groups are scheduled to last 2 hours each, so that the 176 participants in two-hour sessions equal 352 burden hours.

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

NTIA estimates that the costs of these focus groups will be \$150,000.

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

This is a new collection thus a program change.

16. For data from the collections that will be published, outline the plans for tabulation and publication.

NTIA will not publish the data collected.

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 is not seeking approval to refrain from displaying the expiration date.

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

This collection of information will not employ statistical methods.

Attachments: Federal Register Notice
 Sample Survey Instrument
 Discussion Outline (Script)