

**SUPPORTING STATEMENT  
U.S. DEPARTMENT OF COMMERCE  
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION  
CONVERTER BOX COUPON PROGRAM-CONSUMER AND RETAILER  
PILOT TEST SURVEYS  
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 17, 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). The regulations permit consumers to submit applications to NTIA for coupons beginning January 1, 2008. See 47 C.F.R. § 301.3(b).

This emergency review request is required for NTIA's proposal to test the coupon program prior to a full nationwide launch by employing a "live pilot" test. An effective pilot test including consumer and retailer feedback is essential to the success of the coupon program because they will identify any problems or areas of concern that need attention.

The volunteers will be the contractor's employees, friends and family, and NTIA employees who are eligible to participate in the coupon program. Emails will be sent to the contractor's and NTIA's employees soliciting eligible volunteers and requesting that they canvass family and friends. The eligible volunteers will apply for the coupon(s), receive the coupon(s) through the U.S. mail, and attempt to redeem it at a local retailer for an "eligible" converter box. As part of this pilot test, consumer volunteers will respond to a survey which will provide feedback on their experience when they used the coupon in participating retail stores.

The retailers will receive the survey via email. They will also provide feedback on the program regarding their experience in redeeming the coupons, inventory control matters, and employee training support.

**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.**

The information collected will be used by Ketchum, Inc., a global public relations firm, that is leading the consumer education program as a subcontractor to IBM, NTIA's prime contractor. The information will be used to evaluate the operations related to the consumers and retailers processes. This is a one-time only collection.

**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 consumer survey will be available and submitted on the NTIA Digital-to-Analog Conversion website (<http://www.dtv.gov>). The survey may also be completed by calling the contractor and answering the survey questions.

The retailer survey will be returned by fax. Those retailers that do not return the form by fax will be contacted by telephone.

**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 if the collection is not conducted or is conducted less frequently.**

In the absence of a pilot test, prior to full-scale launch, NTIA cannot know the strengths and weaknesses in the program. The pilot test is intended to work out any bugs in the system at the earliest stage possible. Only data supplied by consumers and retailers actually using the system can accurately identify where the flaws may reside in this process. Thus the survey portion of the pilot test is essential to the success of the pilot, and ultimately the program.

**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 information for 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 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 copy of the Federal Register notice to be published is in ROCIS.

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

Payments will be made to consumer volunteers that complete the survey. The payment will be a \$25 gift card at the participating retail store where the participant redeemed the coupon. The payment will encourage participation and completion of the survey.

The retailers will not be provided a payment or gift.

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

The data collected will not be published or used for purposes other than ensuring an effective rollout of the Coupon Program. 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 surveys do 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 15 minutes hours to enter the requested data for each survey.

Consumer Survey - 1,000 X 15 minutes = 250 hours  
Retailers Survey - 100 X 15 minutes = 25 hours

**TOTAL HOURS = 275 hours**

**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).**

Not Applicable.

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

The cost to the government is part of the contract with Ketchum, Inc.

**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 information collection request, no program changes or adjustments.

**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.**

Not Applicable.

**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.

