SUPPORTING STATEMENT

U.S. Department Of Commerce

National Telecommunications and Information Administration
Message Testing Focus Groups and Interviews for the Digital-to-Analog
Converter Box Program
OMB Control No. 0660-XXXX

A. JUSTIFICATION

REVISED-Questions 1, 9, and 12 (in bold). This is to request emergency review to collect information by conducting focus groups and interviews for the Digital-to-Analog Converter Box Program.

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 187, 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.

Since September 2007, NTIA has been conducting a consumer education campaign to educate U.S. residents who receive over-the-air broadcasts on analog television sets about the digital television transition and the TV Converter Box Coupon Program. The education campaign was built around a transition date of February 17, 2009. On February 11, 2009 the President signed the DTV Delay Act into law changing the date by which all full-power television stations must cease analog broadcasts to June 12, 2009. With that date shifting, additional consumer outreach must be conducted to educate U.S. consumers who have yet to prepare about the date and encourage them to take action.

While awareness of the coupon program has been reported at well over 90 percent by numerous sources, millions of households were completely unprepared as of February 2009, based on Nielsen data. In an effort to help further determine who those households are, if the households have taken any steps to prepare for the transition, if not why, and the optimal messages and methods to communicate with the consumers who are not ready in the final months leading up to the transition, NTIA, through its contractor, will conduct focus groups and a limited number of individual interviews to lead in the development of new messages and materials to reach these

consumers. The research will be conducted with representatives from all of our target audiences (minorities, economically disadvantaged, seniors, rural residents, people with disabilities), but will oversample those target demographic groups that are further behind in the preparedness efforts than the general population (i.e., African American, Hispanic).

These consumers are targeted because they represent the demographic groups that have a disproportionately higher number of over-the-air households compared to the rest of the U.S. These groups have been the focus of consumer outreach efforts since the beginning of the campaign. In addition, the most recent Nielsen data on unprepared households continues to show that African American and Hispanic households still lag behind the rest of the country in preparing for the transition.

The recruitment process requires a variety of methods to identify those who may be appropriate to participate in the proposed focus groups. The recruitment is being conducted by the focus group facility where the groups will occur. Depending on the complexity of the individuals being recruited, their methods vary. However, most are using one of three methods for recruitment.

- 1. Contacting consumers on in-house lists that provide some degree of the demographics at a particular phone number (i.e., Hispanic household, African American household, etc.);
- 2. Working in collaboration with community-based organizations that serve a specific demographic population to determine if they have any constituents that may meet the screening criteria; and
- 3. Posting flyers in public places (i.e., shopping malls, stores) announcing the research and asking those that may fit the criteria to call.

The individual interviews will be conducted with consumers who are visually or hearing impaired. The individual interviews will follow the same discussion that the focus groups follow, but will be conducted one-on-one via phone. This group is independent of the focus group. This is done for two reasons: (1) NTIA does not believe they can locate enough participants that fall into these groups and meet the criteria in a geographic location that is a reasonable distance for all; and (2) NTIA would like to accommodate the needs of these individuals such as conducting the interviews via TTY, etc.

NTIA <u>will use professional focus group facility recruiters to recruit participants</u>. The facility will contact potential participants by phone to determine if they meet our criteria (i.e., over-the-air household, has not taken action, fit the demographics of the groups for which we are recruiting. If they meet the criteria, they will be asked if they want to participate in the focus groups or interviews.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If NTIA=s Information Quality Guidelines apply, state this and confirm that the collection complies with the Guidelines.

NTIA proposes to conduct no more than thirty-two (32) focus groups ten (10) cities. Up to eight additional participants will be interviewed who are located in border towns. The information will be collected by Ketchum Inc. in cooperation with Campbell and Company. Ketchum Inc., a global public relations firm, is leading the consumer education program as a subcontractor to IBM, NTIA's prime contractor. NTIA awarded a contract to IBM to administer the diverse operational elements of the Coupon Program. The information will be used to develop consumer education messages and materials related to the Coupon Program

The collected information will not be disseminated to the public.

3. <u>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</u>.

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

4. Describe efforts to identify duplication.

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

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

This information collection does not involve small businesses.

6. <u>Describe the consequences the Federal program or policy activities if the collection is not conducted or is conducted less frequently.</u>

If focus groups and interviews are not conducted to collect this information, the consumer education campaign as well as the application process may continue to deter these targeted 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 June 12, 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 take 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, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice soliciting public comment will be submitted to coincident with the submission of this emergency review request. A copy of the Federal Register Notice, as submitted, is located in ROCIS.

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. The payment will range from \$65 to \$75 per recruit, depending on the market. This is standard practice in focus group recruitment and is necessary to attract and retain diverse participation in the focus groups. Typically ten participants are recruited, since there may be no-shows, but everyone is paid who shows, regardless of whether they are selected to participate.

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

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 (P.L 93-579), amended January 2, 1991. http://www.usdoj.gov/oip/privstat.htm. NTIA will not permit anyone outside this project to see,

listen or read anything recorded. All the information given by the participants will be kept private as allowed by law. We will not include participants' names in the report. Assurance of confidentiality will be given to the participants.

The tapes, recruiting information, and any of the research materials associated with this project will be destroyed by July 2009.

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.

Thirty-two (32) focus groups with a maximum of 10 participants in each group total 320 potential participants. Ketchum will also be talking to up to eight additional people via individual interviews because the focus group setting would not work for this population. Focus groups are scheduled to last no more than 1 hour and 30 minutes each.

328 potential participants X 15 minutes (screener questions) = 82 hours 328 participants X 90 minutes (focus groups) = 492 hours

Total Hours: 574 burden hours

13. <u>Provide an estimate of the total annual cost burden to the respondent or recordkeepers resulting from the collection (excluding the value of the burden hours in #12 above)</u>.

Not Applicable.

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 of information thus no program changes or adjustments.

16. <u>For collections whose results will be published, outline the plans for tabulation and publication.</u>

NTIA will not publish the data collected.

17.	If seeking approva	l to not display	the expiration	n date for (OMB approval of the
<u>info</u>	rmation collection,	explain the rea	<u>asons why dis</u> p	<u>play would</u>	<u>be inappropriate.</u>

Not Applicable.

18. Explain each exception to the certification statement .

Not Applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection of information will not employ statistical methods.