

Commission-Focused Recommendations

1	the Commission's three pronged effort should not function as silos, but as interrelated efforts. Consumers must also be aware that the "right rules" are in place so that they will not be harmed by the DTV transition.
2	outreach and educational efforts must be interactive; consumers know best how television serves their needs and the Commission should be listening to consumers now to ensure that the "right rules" are in place to ensure America's television broadcasting system is at least as vibrant as it is before the transition, hopefully, more so.
3	the "right rules" are meaningless if not properly enforced. The Commission must remain vigilant in enforcing rules so that consumers are aware of their rights and protected from unscrupulous vendors, access by people with disabilities is ensured, and the transition has a positive impact on consumers.
4	it is the Commission's responsibility to take the lead in ensuring that consumers across the country are aware of the transition and, in the case of people with disabilities, do not lose the captioning access to which they have become accustomed after it occurs
5	the Commission use as a model its efforts leading up to January 1, 2000 when, it was feared, many computers would malfunction ("Y2K").
6	the Commission should immediately appoint one or more commissioners to lead the DTV education effort in coordination with the Consumer and Governmental Affairs Bureau.
7	Commissioners and staff should make as many public appearances, including media appearances such as daytime talk shows, as practical to discuss the DTV transition.
8	The Commission's plan should: 1) identify the households most likely to be at risk of losing TV service; 2) concentrate and leverage its limited resources on reaching these households; 3) work with partners on crafting and disseminating the right message to motivate these households to take necessary action to ensure continued television service; and 4) ensure that consumers are not harmed by the transition.
9	The Commission should collect data immediately that reveals the demographics of these at-risk groups. This data collection should be ongoing so the FCC and NTIA know who is being reached and who's already taken steps to make the transition.
10	the Commission commit to ongoing data collection and to immediately reach out to industry players and others to see if the data already exists and can be shared. If not, the Commission should request the Census Bureau of the Department of Commerce to collect this data. The Commission should be an active participant in writing the Bureau's questions.
11	the Commission should act quickly to determine how analog cable subscribers who do not rent or own set-top boxes will be impacted by the DTV transition. Are they also at risk of losing their access to broadcast TV channels after the transition? The CAC asks that the Commission coordinate a finding that includes broadcasters, cable operators, consumer electronics manufacturers and retailers for a definitive answer on this question.
12	Commission should encourage and consider producing educational videos in American Sign Language that are accessible on the Internet. the Commission should post these PSAs on Internet video sharing sites such as YouTube. The Commission should request money from Congress for a paid-for PSA campaign. Such payments are often needed for airing of PSAs in the ethnic media.
13	The Commission should make reports about broadcasters' and MVPDs DTV educational efforts available via a centralized, searchable database on FCC website.
14	The data, in turn, should be analyzed and used in frequent reports to Congress on the progress of the DTV education plan.

Requirements for Broadcasters	
15	require each broadcast television licensee and encourage each radio licensee to air PSAs about the transition, consumers' future viewing options, and the NTIA digital-to-analog converter box discount program.
16	require quarterly, electronic reporting from each TV station so the on-air efforts can be monitored.
17	require that stations certify that they are complying with the PSA requirement
18	inform stations that the failure to comply with the PSA requirement and/or certification may result in the maximum civil penalties permitted by law.
19	Broadcasters should be encouraged to air programming - either within local newscasts or separate full-length programs - that describes the transition, the benefits, consumer options, and demonstrate converter boxes.
20	establish minimum PSA requirements.
21	tie the PSA requirement to programming ratings. DTV-related PSAs should be run during a broadcasters' highest-rated shows and the shows with the highest ratings for at-risk communities including households with annual incomes of less than \$30,000 and are headed
22	will continue to be free, will offer consumers many more channels and will give them a better picture even on an older set-if they get a converter box. PSAs should also convey consumer options - including the least expensive path to receiving DTV signals. PSAs should
23	PSAs should be in Spanish and Asian languages.
24	mandate that these PSAs be captioned, preferably with open captions, whether for broadcast, cable, satellite or on the Internet
25	PSAs should also include toll free numbers in appropriate languages to call for more information and the numbers should be displayed both visually and audibly. Call center staff responding to calls must be trained to honor their legal obligation to receive and respond to
26	require television broadcasters to file quarterly, electronic reports on their consumer education efforts, including the time, frequency, and content of public service announcements aired.
27	require these filings beginning January 2, 2008, and continue through May 1, 2009.
Requirements for Cable & Satellite TV Operators	
28	require MVPDs to educate their customers about the effect of the DTV transition on their TV service.
29	MVPDs should consider a range of options to fulfill this responsibility, including things such as bill inserts, emails, PSAs, special information channel, statement messages, individual mailings, website messages, etc.
30	For printed material, when requested to do so, MVPDs should make DTV transition information available in alternative formats to individuals who are blind or low vision.
31	require quarterly reporting from each MVPD so their efforts can be monitored.
32	MVPDs must be a reliable source of that information and not exploit the opportunity to sell consumers equipment or services they may not need.
33	MVPD subscribers should be made aware if they will be required to rent a set-top box or buy a digital-to-analog converter box to continue viewing broadcast TV channels after the transition. If the latter, consumers should be made aware of how the converter box will work with their MVPD hook-up.
34	If MVPDs include inserts about the transition and future viewing options with bills, consumer protections should be in place to ensure that these consumers know their full range of options, including the least expensive ones.
35	Toll free numbers to call centers should also be noted on the bill inserts and notices. CAC recommends that these call centers should be staffed with multilingual operators appropriate to the communities served by the MVPD. Toll free numbers to call centers should be set up for the explicit purpose of responding to consumer calls on this matter, and the numbers of those centers should be noted on the bill inserts and notices. Again, such call centers should be familiar with and prepared to receive and respond to calls made via specialized equipment used by people with hearing and speech disabilities and through TRS.

Requirements for TV Equip Manufacturers

36	consumer electronics manufacturers information about the transition should be standardized with input from the Commission
37	Toll free numbers to call centers should be provided on this information, and the call centers prepared to receive and respond to calls made via specialized equipment used by people with hearing and speech disabilities and through TRS.
38	the Commission should adopt and enforce rules that ensure consumers get the correct information concerning their future viewing options, the digital-to-analog converter box coupon program and DTV technology compatibility with existing technology including VCRs, DVRs, and DVDs.
39	Consumers should always be made aware of their least expensive migration paths to DTV.

Requirements for Electronics Retailers

40	FCC should help create standardized messages that would be used in consumer electronics trainings and consumer information plans
41	Point of sale information should be provided in the retail outlets in the main languages spoken in the communities served by these retailers, as well as in alternative formats for individuals who are blind or low vision
42	Toll free numbers to a call center where the consumer could obtain more information should be provided. The call center should be staffed by representatives who speak the languages used in the point of sale information. Such call center staff must be trained to accept, receive, and respond to phone calls that come into the center through specialized equipment or via the nation's telecommunications relay service system from persons with hearing disabilities and persons with speech disabilities who use relay services.
43	Information on the DTV transition should also be included in newspaper ads, etc. placed by these retailers
44	Consumer Electronics Retailer Training and Education should include information on the ability of individual converter boxes to correctly pass through captions and on-site demonstration of any setup steps the converter box requires to display captioning. Consumers should be able to view captions on television models at the point of sale and test captioning features.
45	The training should also include an easy return policy, without penalties, for DTV converter boxes and other television receiving and display electronic equipment that do not work correctly and/or do not display captioning.
46	the Commission should adopt and enforce rules that ensure consumers get the correct information concerning their future viewing options, the digital-to-analog converter box coupon program and DTV technology compatibility with existing technology including VCRs, DVRs, and DVDs. Consumers should always be made aware of their least expensive migration paths to DTV.

Requirements for DTV.gov Partners

47	For the eight television station owners in the partnership, their on air DTV education efforts should be reported as noted above.
48	For the broadcast-related organizations that are not licensed for television broadcasting - ABCNews Now, American Public Television Stations, the Association for Maximum Service Television (MSTV), the National Association of broadcasters, and the Public Broadcasting Service - they should be asked to report what their on air efforts are or how they are encouraging their members to participate in on air efforts.
49	For all the groups in the partnership, the Commission should remind them, via Public Notice, that they have an important responsibility to ensure that consumers get the correct information concerning their future viewing options, the digital-to-analog converter box coupon program and DTV technology compatibility with existing technology including VCRs, DVRs, and DVDs. Consumers should always be made aware of their least expensive migration paths to DTV.
50	add consumer groups in the partnership.
51	The Commission should encourage, if not require, that the partners coordinate their efforts with each other and with government outreach and education.
52	All outreach and education should use standardized messages that are created with the help of the Commission.
53	Survey data should be used to target populations and identify in what languages outreach is needed.
54	Outreach efforts should not rely only on the Internet.
55	To reach all target population, any outreach plan must rely heavily on community based organizations (CBOs) that serve these consumers.
56	CBOs will need materials provided for free, in bulk and in the different languages spoken in the communities they serve. Training materials for CBO staff will be needed in addition to brochures for consumers. Such brochures must be available in accessible formats for individuals who are blind.
57	the CAC notes that extensive advertisements will need to be placed in the ethnic media at the national and local level.

Spectrum Auction Winners

58	When 700MHz winners are determined, those entities will have a huge financial stake in analog TV spectrum being vacated for their use. The CAC recommends that, as part of the 700 MHz auction rules, the Commission require the winners to participate in the DTV education campaign and report on how they have aided the DTV education effort.
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Additional Government Partners

59	CAC believes that there is great potential to reach a hard to reach at-risk community by encouraging notices from telecommunications carriers to their customers, especially their Lifeline and Linkup customers.
60	The Commission has established as a baseline criteria for Lifeline/LinkUp eligibility participation in Medicaid, Food Stamps, Supplemental Security Income (SSI), Federal Public Housing Assistance (Section 8), Low-Income Home Energy Assistance Program (LIHEAP), Temporary Assistance to Needy Families (TANF) or the National School Lunch Programs Free Lunch Program. The Commission should work with these program administrators to distribute information about the DTV transition.
61	The Commission should consider using the federal government, the nation's largest employer, to inform every federal employee about the transition - perhaps through paycheck inserts. This program could be a model for voluntary programs by MVPDs, Lifeline/LinkUp providers and other billers noted in the NPRM. These employees could then share news of the transition to friends and family via word of mouth.
62	Commission should seek additional Federal partners that have local contact points with citizens such as the United States Post Office and the Social Security Administration.
63	The Commission should encourage every government web site - including those of members of Congress - to link to DTV education websites.

Special Efforts for People with Disabilities/Addressing Captioning Difficulties

64	the Commission should convene a working group -- that includes representatives from the broadcasting, cable, and satellite industries, television and set top box equipment manufacturers, MVPDs, captioning providers, electronic retailers and captioning consumers -- to ensure that consumers with disabilities are not harmed by the transition
65	>> Such a group, which should include top engineering personnel from the relevant industries and the Commission, should be tasked with: 1) identifying current and anticipated problems with the transmission and display of captions over digital programming, 2) evaluating and assessing their components, systems, and set top boxes for compatibility with captioning services, and 3) developing solutions to existing and potential problems in order to ensure the capability to pass through closed captions intact to the consumer.