FCC INTERGOVERNMENTAL ADVISORY COMMITTEE

December 19, 2008

Honorable Kevin J. Martin
OFFICE OF THE CHAIRMAN
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Digital Television Transition Comments and Recommendations of the FCC
Intergovernmental Advisory Committee

ADDITIONAL COMMENTS

Dear Chairman Martin:

The Intergovernmental Advisory Committee (IAC) was appointed by the FCC to provide feedback on various issues coming before the FCC, particularly the transition to digital television. In that capacity, the members of the IAC have met monthly by teleconference and in person on a quarterly basis to discuss, among other matters, DTV issues, opportunities and challenges. Thank you for the opportunity for the IAC to once again provide your office with input on the upcoming transition from analog to digital television that the nation is preparing for this February 17, 2009.

Upon review of the FCC’s digital television transition and outreach plan, as well as feedback from soft tests and the early transition to digital television in Wilmington, VA, the IAC has
recognized a number of issues, about which members will here provide additional input to the FCC. Among these issues are: call center capacity and staffing, internet capacity, ability of FCC to communicate with community in case of transition problems, and FCC troubleshooting guide.

Call Center Capacity and Staffing

The IAC recognizes that the FCC has done an outstanding job of educating the public about the DTV transition. However, we are concerned that education may not translate to preparedness on February 17, 2009. The IAC urges the FCC to prepare for an extremely high volume of phone calls throughout the transition to DTV. Call center capacity and staffing should be appropriately gauged and anticipated to prevent call center busy signals and long wait times.

Internet Capacity

In addition to phone capacity, the IAC is concerned about internet capacity for questions submitted through the dtv.gov website. Undoubtedly, there will be an increased number of hits to the website during the time of the transition, and the IAC recommends the FCC take measures to be able to provide appropriate and timely responses.

Communication with Communities

The IAC recommends that the FCC prepare to communicate with local and regional communities in the case of a large scale issue with the transition. The FCC should prepare a message and a distribution plan in case of major challenges, such as a regional power outage, equipment malfunction or the like. The IAC suggests the message should acknowledge the problem and relay to the public that the authorities are working to correct it.

Troubleshooting Guide for Digital-to-Analog Converter Boxes and Digital Televisions

Upon review of the Troubleshooting Guide produced by the FCC, the IAC recommends that the FCC simplify the language of the guide and include more illustrations. The digital transition will affect millions of Americans. The IAC recognizes that the Troubleshooting Guide can be a very valuable resource for the public, but only if it is clear, understandable and easy to follow. Since various digital-to-analog converter box models have the same basic operation, the IAC
suggests that illustrations, particularly in the “Check Your Connections” section of the Guide, would be consistent among manufacturers and certainly helpful to consumers.

**Conclusion**

The IAC appreciates the work FCC staff has done in preparation and acknowledges the detailed technical information readily available on the internet at DTV.gov. The IAC encourages the increased efforts currently underway to reach the communities in need from December 2008 to February 17, 2009. While the focus of our comments and recommendations was previously on awareness, the IAC now recognizes the on-the-ground need for preparedness. Surveys show that consumers are aware of the transition, but the Wilmington, VA experience demonstrates the need for call center and internet capacity, methods for communication and messaging, and an accessible and understandable troubleshooting guide.

The IAC will continue to monitor progress of the DTV transition plan and to work with the FCC to improve Tribal, lower income, minority, elderly and non-English speaking community outreach and education about the transition. Thank you once again for the opportunity to participate in this important process and for the Commission’s consideration of the above comments and recommendations.

Sincerely,

Haley Barbour, Chair