

SUPPORTING STATEMENT
U.S. Department of Commerce
National Telecommunications and Information Administration
DTV Texting Campaign
OMB Control No. 0660-XXXX

A. JUSTIFICATION

This is to request expedited review of this information collection. Approval is requested by May 14, 2009.

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

Days before the nation's full-power television stations were slated to complete the transition to all-digital broadcasting, President Obama signed the DTV Delay Act into law, moving the final day for transition from February 17 to June 12, 2009. Congress passed the legislation, which gave unprepared consumers more time to prepare for the transition.

The American Recovery and Reinvestment Act of 2009 (ARRA), signed by President Obama on February 17, authorizes \$650 million in funding for additional coupons and the extension of related activities, including consumer education. To communicate the change in the transition date – and to help unprepared consumers to take action and maintain their access to television programming – the National Telecommunications and Information Administration (NTIA) is extending its consumer education outreach effort.

The campaign, to reach the listed audiences, is being run because as of March 29, 2009 Nielsen indicated 3.4 percent (approximately 3.9 million of the 114.5 million U.S. TV homes) were completely unready for the switch. While this number is relatively small, several demographic groups are unprepared at a rate significantly higher than the national average:

- 6.3 percent of TV homes where the head of the household is under 35 years of age.
- 6.2 percent of African-American TV homes.
- 5.6 percent of Hispanic TV homes.

Program objectives:

- Encourage immediate action among those households that have yet to prepare.
- Increase awareness of the steps required to participate in the TV Converter Box Coupon Program.
- Generate requests for coupons, particularly among target audiences that are behind in their level of preparedness.

- Encourage consumers who apply for TV Converter Box Coupons to use them prior to the conclusion of the transition and the coupon expiration date.

According to MRI 2008 Doublebase, 61 percent of all U.S. adults between the ages of 18 and 34 have a cell/mobile/PDA device with a text message feature and 40 percent have used that feature within the past 30 days. Among our two primary target populations, there is high usage with 50 percent of Hispanic and 54 percent of African-American consumers age 18-34 having a device with text message capabilities. (Thirty-two percent and 34 percent respectively have used feature in past 30 days.) A viral texting (viral is using existing networks to leverage word-of-mouth and generate buzz/awareness around an issue or cause) campaign will help to increase the impact on our target audience by engaging them via SMS (short message service) text. It will also increase the number of interactions we have with our target audience and extend the reach of the program's educational efforts by generating word of mouth engagement from our audiences.

This is how the campaign will work:

A billboard will display a question (examples in ROCIS) and prompt a consumer to send the answer via a phone text. From that point, a responding text will be used to send information about the Coupon Program.

The viral texting campaign will deploy a mobile text projection unit equipped with an LCD projector to 10 markets to support local Mobile Assistance Centers' (MAC) events and/or the DTV Assistance Centers. (Since the activity must occur at night, DTV Assistance Centers will only be considered if evening hours are available.) Passers by at each venue will see a large projected billboard displaying a fill-in-the-blank headline. The billboard will prompt consumers to engage in the conversation and display a number where they may send their text. Messages will be moderated and those approved will be displayed, creating a dynamic and interactive experience at each venue. These are scheduled for between 6-10pm at night (some will not start until 8pm, etc.) on May 14, 15, 16, 21, 22, 23, 24, 28, 30, June 6. (These dates are subject to change; exact street locations to be confirmed)

The IBM/Ketchum team will design the billboard to be displayed in English and Spanish, license the mobile text projection technology, identify appropriate locations, secure appropriate permits, and coordinate with MAC staff, and provide onsite support and text moderation. To supplement the texting campaign, NTIA will conduct extensive earned media outreach (both traditional and non-traditional media) and engage local partner organizations to promote the texting tool. Throughout the viral texting campaign tour, photos and/or video snapshots of the outreach will be provided. NTIA will also submit a report summarizing the final schedule and outreach activities.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

The information will not be used at all. NTIA is only displaying the question to generate a conversation with the consumer to inform them of the digital transition on June 12, 2009.

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.

Participants will text using their cell phones. The information will only be stored for the 3-4 hours of the event.

4. Describe efforts to identify duplication.

Duplication will not occur because numbers will be blacklisted so the consumer will only receive one message about the DTV transition on June 12th. Again, the numbers are only stored for the 3-4 hours of the event.

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

Not Applicable.

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

If this information is not collected, NTIA will miss the opportunity to engage and inform the targeted audiences. The research quoted above demonstrates that this campaign has the potential to be very successful with these target audiences.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

Not Applicable.

8. Provide the information 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 taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency 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.

This is an expedited review request with time-restraint issues, OMB has waived the publication of a Federal Register notice.

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

There are no gifts or payments to respondents.

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

If a consumer chooses to participate and submits a response that is relevant to the discussion, it will be posted on a public billboard for everyone within sight to see. The message will rotate off as others text in a message. No assurance of confidentiality is given.

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.

There are no questions of a sensitive nature.

12. Provide an estimate in hours of the burden of the collection of information.

It is estimated that 1,000 respondents will take less than a minute, but this will be rounded to one minute, to provide a text message.

$$1,000 \times 1 \text{ minute} = 17 \text{ hours}$$

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

If a consumer chooses to participate, standard texting charges assessed by the consumer's carrier will apply.

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

The estimated cost to the Federal government is \$89,000.

15. Explain the reasons for any program changes or adjustments.

This is a new collection.

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

There is no tabulation or publication of information. If a consumer chooses to participate, his/her response will be posted on an electronic billboard for a short period of time to be replaced by other respondents on a rotating basis.

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.

The space available on the electronic billboard is limited. NTIA is not storing or retaining any personal information. All activity will occur within a 3-4 hour timeframe.

18. Explain each exception to the certification statement.

Not Applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection does not employ statistical methodology.